

QUALITY MANAGEMENT MEMO

COUNTY OF SAN DIEGO BEHAVIORAL HEALTH SERVICES

To: Substance Use Disorders Service Providers **Date:** July 5, 2018

From: Tim Tormey, Behavioral Health Program Coordinator

Re: **Travel Time Guidelines – County of San Diego Drug Medi-Cal Organized Delivery System**

The County of San Diego Drug Medi-Cal Organized Delivery System (DMC-ODS) permits claiming for travel time when it is linked to the delivery of a direct DMC-ODS substance use disorder service (i.e. staff time to travel to/from providing a direct service to a client). 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 appropriate fields of the progress note the **"travel to location"** start and end time, the **"travel from location"** start and end time, and the **"total travel time"** for the delivery of the service. These are required elements for documentation to increase accuracy in travel time claimed and reduce audit risk. In the body of the progress note, a narrative documentation of the "to" and "from" 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 recovery residence 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 and significantly extends travel time.

Documentation and claiming examples are below:

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:

Document the starting and ending point in a progress note, with documentation of the **"travel to location"** start and end time, the **"travel from location"** start and end time, and the **"total travel time"** in the corresponding prompts on the progress note. It is not permissible to claim the entire travel time for both clients to just one client.

Counselor travels from office to Client A's home. Claim for travel time from office to Client A's home.



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Counselor 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.

If Counselor travels back to the office, travel time can be claimed from Client B's home to the office.

Documentation Example: Client A: "Counselor traveled from office in Mission Valley to client's home in Escondido." Client B: "Counselor traveled from Escondido to client's home in Carlsbad and back to the office in Mission Valley."

Travel Time when Starting or Ending at Home

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.

Counselor claims travel time from their home in Mira Mesa to client's home in Escondido, then claims travel time to the office in Mission Valley after the service. (This is acceptable because the client's home in Escondido is closer to Mira Mesa than it is to the office in Mission Valley).

Counselor travels from home in Chula Vista to client's location in Fallbrook to start the day. Office is in Mission Valley. When traveling from counselor's home to client's location, if the distance is **farther** than the office to the client's location, counselor may only claim the standard travel time from the office to client's location. For example: counselor home to client location is 50 minutes, but office to client's location is 30 minutes, then counselor can only claim 30 minutes travel time.

Documentation Example: "Counselor 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."

Travel Time for Multiple Clients and Same Location

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 just one client.

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 calculation should be explained in both clients' progress notes.



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Travel Time between Provider Sites

Is it permissible to claim for travel between provider sites when providing DMC-ODS substance use disorder services?

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 staff member travels from office in Mission Valley to attend a meeting at another DMC-ODS provider's office. Program may not claim for this travel time when delivering DMC-ODS substance use disorder services as the provider's office is (or will be) Drug Medi-Cal certified with a Provider number.

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 DMC-ODS substance use disorder services as the affiliated office has (or will have) its own individual Drug Medi-Cal certification and Provider number.

A staff member travels from program office to client's residence, picks up client and drives client to another DMC-ODS 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.

When a staff member travels from the program office and provides a DMC-ODS substance use disorder service at an offsite location (home, recovery residence, community location) and then goes from the offsite location to another provider site, the travel time to the offsite location and return trip may be claimed if it is a component of a reimbursable DMC-ODS substance use disorder service.

For questions regarding this memo, please contact QIMatters.HHSA@sdcounty.ca.gov



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