Provider Alert #10

May 29, 2018

HealthChoices Contracts:
- Allegheny
- Berks
- Blair
- Carbon/Monroe/Pike
- Chester
- Erie
- Lycoming/Clinton
- North Central
- Northeast
- York/Adams

Peer Support Services (PSS)
A Non-Compensable Service During Travel

Scope: This Provider Alert applies to all PSS providers in all HealthChoices contracts

Purpose: To remind all PSS providers of Community Care's stance on billing for travel or billing for PSS provided during travel. For this Provider Alert, the term “travel” also includes transit, transport, and transportation.

Travel time, staff meetings, record-keeping activities, and other non-direct services are not billable as PSS. PSS may not be provided or billed when occurring during travel, with or without the member present. While the provider's policy may permit their peer support staff to travel, costs related to travel are not billable. Further, travel was included when developing the Community Care HealthChoices fee for this service, and therefore is not billable.

Exception: PSS may be billed during transportation on a very limited basis, when the peer support staff member is supporting/training/coaching/assisting the member to attain greater independence for which transportation is required. Under these very limited circumstances, documentation must clearly reflect: identification of the barriers to and need for independence with transportation identified and fully described in the assessment process, a specifically stated goal and time-limited interventions on the member's service plan, timely updates to the plan, and detailed progress notes reflecting on the treatment plan and member's progress towards the goal.

Reference:
Office of Mental Health and Substance Abuse Services Bulletin OMHSAS-16-12 Peer Support Services-Revised (obsoleting Bulletin: Mental Health Bulletin OMHSAS-09-07: Peer Support Services, Revised) appended by the Provider Handbook for Psychiatric and Partial Hospitalization Services; Section VII - Other Services; Updated Handbook pages, Peer Support Services (II. Peer Support Services (PSS) (Revised 12/12/16 to allow services for ages 14 and up) describes non-compensable services as follows:

Payment will not be made to a PSS agency for the following:
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(1) Services that are purely recreational, social, or leisure in nature, or have no therapeutic or programmatic content

(2) Peer support services that are provided to individuals as an integral part of another covered MA service

(3) Administrative costs, such as those resulting from agency staff meetings, record-keeping activities, and other non-direct services

(4) Costs related to travel

Additionally, on September 6, 2017, OMHSAS released a PSS FAQ document that further articulates that billing for PSS during transport is non-billable as follows:

Non-compensable services:

Question: Is a [Peer Support Services] PSS agency permitted to bill for transportation? For example: Is the time billable when the CPS is transporting an individual to a meeting, appointment, etc., and using that time to provide peer support?

Answer: No, in the Pennsylvania HealthChoices program, transportation is not a billable service for PSS. The standards for Peer Support Services state “travel time, staff meetings, record-keeping activities, and other non-direct services are not compensable.” Agency policies for PSS may or may not allow for transporting an individual admitted to the PSS program. The agency needs to provide training to the CPS staff on policies related to non-billable transportation. When agency policy permits a CPS to transport an individual, PSS should not be provided during the time of transport.

Community Care recommends that PSS providers clearly communicate with peer support staff their agency’s policy and procedure related to travel and billing practices. In the event a provider encounters a situation in which billing and payment for travel or services delivered during travel have occurred, the provider may voluntarily submit a self-report to the Department of Human Services and Community Care. Please refer to Fraud, Waste & Abuse Compliance Program Policy #FWA 001.