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DEPARTMENT OF PUBLIC WELFARE  
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**OFFICE OF MENTAL HEALTH  
AND SUBSTANCE ABUSE  
SERVICES BULLETIN**

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SUBJECT:

Targeted Case Management (TCM) - Travel  
and Transportation Guidelines

BY:

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**SCOPE:**

County Mental Health/Intellectual Disability (MH/ID) Program Administrators  
Targeted Case Management Service Providers  
Base Service Unit Directors  
Behavioral Health Managed Care Organizations (BH-MCOs)

**PURPOSE:**

The purpose of this bulletin is to provide the Department of Public Welfare's (Department) policy regarding payment for mental health targeted case management services.

**BACKGROUND:**

Targeted Case Management (TCM) services assist adults and children with serious mental illnesses or emotional disorders to gain access to needed resources and services. TCM services are administered either directly by the County MH/ID Program Offices or by the providers contracted by the County MH/ID Program Offices. Medicaid covers three levels of intensity of TCM services: Intensive Case Management, Resource Coordination, and Blended Case Management. The Department specifies the payment conditions for TCM services in 55 Pa.Code § 5221.42 (relating to payment).

**COMMENTS AND QUESTIONS REGARDING THIS BULLETIN SHOULD BE DIRECTED TO:**

Office of Mental Health and Substance Abuse Services, Bureau of Policy, Planning & Program Development,  
P.O. Box 2675, Harrisburg, PA 17105. General Office Number: (717) 772-7900.

## **DISCUSSION:**

The Federal regulation at 42 CFR § 440.169 (relating to case management services) specifies the components of case management services. Section 440.169 does not identify the time a case manager spends traveling as a component of case management services. Additionally, in Technical Assistance Tool, Optional State Plan Case Management, dated April 18, 2008, the Centers for Medicare and Medicaid Services (CMS) explained that under 42 CFR § 440.169, billable units may not be billed for time spent traveling to a beneficiary to provide a case management service.

Likewise, transporting or escorting consumers to appointments or other places is not identified under 42 CFR § 440.169 as a component of case management services. Furthermore, in the interim final rule at 72 FR 68077 (December 4, 2007), CMS clarified in the Preamble that transporting a consumer to service to which a consumer is referred or escorting a consumer to a service is not a component of case management services (72 FR 68082).

Consequently, the Department is issuing this bulletin to provide that case manager travel time and time spent transporting or escorting consumers should not be billed as a unit of service.