

Adding the Transportation Service to an Individual Support Plan (ISP) in the Adult Autism Waiver (AAW) ODP Announcement 24-005

AUDIENCE:

Individuals and Families, Supports Coordination Organizations (SCOs), Supports Coordinators (SCs) and Transportation Providers in the Adult Autism Waiver (AAW), and Other Interested Parties

PURPOSE:

To provide updated guidance to AAW SCs and their supervisors for adding the Transportation service to ISPs. This communication obsoletes ODPANN 20-045.

DISCUSSION:

The Office of Developmental Programs (ODP) added a Transportation service to the AAW effective January 1, 2020. Since 2020, some changes have been implemented. This communication is intended to provide updated guidance to SCs on how to add this service to ISPs. Transportation is a direct service that enables participants to access services and community activities, as well as jobs, volunteer opportunities and other activities, as specified in their approved ISP.

This service consists of:

1. Transportation-Public (W7272): These are vendor services provided to or purchased for participants to enable them to gain access to services, activities

in the community and resources as specified in their service plans. The utilization of public transportation promotes self-determination and is made available to participants as a cost-effective means of accessing services and activities.

2. Transportation-Trip (W7274, W7275, W7276): This service is transportation provided to participants for which costs are determined on a per trip basis. Transporting a participant from one location to another is considered one unit of service. For example, taking a participant to a waiver service and returning the participant to his or her home is considered two trips or two units of service. The individual must be in the vehicle for the trip to qualify as a billable service.

Transportation (Public and Trip) may be delivered by an organization that directly enrolls with ODP or through an Organized Healthcare Delivery System (OHCDS). Any organization or individual, including friends and family members, may provide Transportation-Trip through an OHCDS.

Transportation can be delivered in Pennsylvania and in states contiguous to Pennsylvania.

When Transportation can be added to an ISP

As with any service, the ISP team must consider the individual's needs. Natural supports and supports that can be provided using other sources should be considered prior to considering services funded through the AAW. When practical and available, the use of public and county-supported transportation is encouraged.

Participants authorized to receive Transportation services may not receive the direct provision of the following services during the same hours as they are receiving the direct provision of Transportation: Day Habilitation, Supported Employment, Therapies, Career Planning, Family Support, Nutritional Consultation, Specialized Skill Development

(Behavioral Specialist Service, Systematic Skill Building, and Community Support), and Small Group Employment.

The Community Support (CS) service can be billed by the provider when the participant is receiving the CS service, is in the vehicle, and the travel is integral to the delivery of the service. This is because the CS service includes transportation that is necessary to enable participation in community activities outside of the home in accordance with the participant's service plan. A participant may not receive CS during the same hours he or she is receiving transportation.

A participant may not receive the direct provision of Transportation to and from a Day Habilitation facility or while he or she is receiving Day Habilitation because transportation is included in the Day Habilitation service.

Participants authorized to receive Residential Habilitation (Community Home or Life Sharing) services may only be authorized for Transportation as a discrete service when the participant requires transportation to or from a job that meets the definition of competitive integrated employment. This is because transportation for reasons unrelated to competitive integrated employment is included in the Residential Habilitation service (Community Home and Life Sharing).

A participant may not be authorized for the direct provision of Transportation while he or she is receiving Small Group Employment because transportation is included in the Small Group Employment service. A Small Group Employment provider is not, however, responsible for transportation to and from a participant's home and transportation could be added to their plan if they need it for the purpose of getting to and from their starting and ending work location.

Consult the AAW service definitions or the AAW Provider Information Table for specific details on those services.

Transportation services may not be substituted for the transportation services that a state is obligated to furnish under the requirements of 42 CFR § 431.53. This Federal regulation requires that the State Medical Assistance agency assure that transportation is available to participants to and from medical providers. In Pennsylvania, medical transportation services are provided through the Medical Assistance Transportation Program (MATP) and therefore Transportation through the AAW cannot be used for medical transportation. For a list of services covered through MATP, please see the Standards and Guidelines available at <http://matp.pa.gov/>.

How to add Transportation to an ISP

Expenditure for Transportation is limited to \$7,500 per participant's ISP year for participants receiving only the Transportation-Public service. Participants who use only Transportation-Trip or who use a combination of Public and Trip may use up to \$10,000, provided that the amount spent on the Public service does not exceed \$7,500 per ISP year. There are no exceptions to this limit. This will require the SC to work closely with the participant and ISP team to determine what the service will be used for over the course of the year and adjust the ISP throughout the year, as needed.

The following provide examples of financial limitations of Transportation in the ISP:

- Debbie currently uses only Transportation-Public. Based on her anticipated use, she would need \$8,500 in Transportation-Public, but the service cannot be authorized for this amount. Debbie's SC talks to the team about adding some transportation through Transportation-Trip to accommodate her needs. The team decides on travel that will cost \$7,500 in Transportation-Public and also \$1,500 in Transportation-Trip. Because this is cumulatively less than \$10,000, and the Transportation-Public component is under \$7,500, it is allowable.

- Bill uses Transportation-Public and Transportation-Trip. He uses \$7,000 in Transportation-Public but also wants to use \$3,000 in Transportation-Trip. This can be authorized because the total cost of the combined Transportation services does not exceed \$10,000 and the total cost of the Transportation-Public service does not exceed \$7,500.
- Brian uses Transportation-Trip only. His travel needs require \$9,500 in Transportation-Trip funds. This can be authorized because the limit for Transportation-Trip is \$10,000.

Providers of Transportation-Public services are reimbursed at the invoice cost for the service provided. The cost must be the same as the cost charged to the general public. SCs should be as specific as possible when entering the number of units, frequency, and duration of the service. For example, the SC should enter the unit as number of tokens, bus passes, ride shares, etc. that will be purchased for the participant. The SC will need to enter the cost per unit into the service line. In addition to reimbursement for the invoice cost, OHCDs providers are also able to bill for an administrative fee. This administrative fee is not factored into the financial limits for the individual's ISP year. The administrative fee is billed under a separate procedure code and should be added to the ISP as a separate service line in accordance with the Provider Information Table.

Following are several examples to help SCs compute and add units of Transportation-Public to the ISP:

- Bill lives in a Harrisburg suburb and rides a bus to visit his friends and go to the State Museum in downtown Harrisburg. These trips are included in his ISP, so his SC adds 12 units of a monthly bus pass to his plan. The monthly pass costs \$50 per month, so the overall cost is \$600. Bill's SCO serves as an OHCDs and purchases the monthly bus passes. The SCO, then submits a claim to PROMISE for the cost of the monthly pass, plus a separate claim for the

OHCDs administrative fee.

- Mary, who lives with her family in Erie, works twice a week at TJ Maxx in the Millcreek Mall. She needs to take a taxi to get to her job. Each taxi ride costs \$15. The SC is aware that Mary is scheduled to miss two weeks of work because of family vacations. The SC adds 200 units of taxi fare – 4 trips per week times 50 weeks – at \$15 per trip, or a total of \$3,000, to her ISP.

Providers of Transportation-Trip are reimbursed on a statewide fee schedule through the use of zones. Rates for Transportation-Trip are as follows:

Unit of Service	Procedure Code	Statewide Fee
Zone 1 (greater than 0 and up to 10 miles)	W7274	\$33.83
Zone 2 (greater than 10 miles and up to 30 miles)	W7275	\$60.91
Zone 3 (over 30 miles)	W7276	\$69.19

The trip zone is calculated by determining the mileage of the most direct route from the participant’s starting location to the participant’s destination. The mileage that

determines the zone for each participant does not take into account the total miles a participant may be in a vehicle going to pick up other individuals, only the miles from each participant's starting location to the participant's destination, as indicated above. Taking a participant to a destination and returning the participant to their home is considered two trips or two units of service.

An SC, along with the individual and ISP team, should anticipate to the best of their ability the number of trips needed in each zone based on the activities for which the individual will use the transportation service. After adding the service to the ISP, but prior to submitting the ISP for approval, the SC and SC Supervisor must ensure the total expenditure being requested for all Transportation procedure codes does not exceed the financial limits for the ISP plan year. OHCDs providers are also able to bill for an administrative fee. This administrative fee is not factored into the ISP year limit for the individual.

The activity for which the participant will use the transportation service must be identified in the Desired Activities section of the ISP or clearly related to a goal and objective.

The following is an example to help SCs compute and add units of Transportation-Trip to the ISP:

- Brandon lives in Hanover, York County, and enjoys going to baseball games. He meets a friend for York Revolution minor league games once a month during the baseball season, which lasts six months. This meets the goal of social interaction skills in his ISP. He needs transportation to and from the stadium, which is provided by an enrolled AAW provider, so the SC includes 12 units of Transportation Trip in his plan – two trips per game (1 to the stadium, 1 from the stadium). Brandon's home is 22 miles from the stadium, which falls into Zone 2, so the SC plans for \$730.92 (12 Zone 2 trips at \$60.91

per trip) of Transportation-Trip in Brandon's ISP.

CONTACT:

Questions about this communication should be directed to the appropriate ODP Regional office.