

<b>Topic:</b>	Community Transportation (Non-Medical): Service Requirements	
	<b>Date Issued/Updated:</b>	05/01/2024

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## Overview/Purpose

This worker's guide outlines requirements related to ODDS funded Community Transportation services. Community transportation is provided in the area surrounding the home of the individual commonly used by people in the same area to obtain ordinary goods and services. Transportation services enables an individual to gain access to community-based state plan and waiver services, activities, and resources, not medical in nature.

Transportation is intended to be flexible and individualized to meet an individual's self-determined monthly transportation needs and preferences. Transportation should be to/from a community location that meets the goal or need identified within the Individual Support Plan (ISP) and which does not cause unnecessary travel. This may be in the individual's home community or in the community closest to the individual's home where resources are available to meet the desired outcome or service need.

Refer to OAR 411-435-0020(9) for more detailed information about the community transportation definition.

Community Transportation consists of two distinct services:

1. Community Access Transportation and
2. To/From Work or DSA Transportation.

These can be authorized in the following codes:

- OR004, PSW Mileage and In-Home Agency Mileage (provided during OR526/OR507)
- OR005, Transportation Provider Agency. This includes providers with an enrollment agreement covering 72-717 DD Non-Medical Transportation Organization in the eXPRS payment system.
- OR554, Transit/Bus Pass
- OR003, Commercial (Taxi)

**PSW Mileage or Agency Mileage (OR004)** is a per mile reimbursement for Personal Support Workers or Agencies who transport ODDS individuals while delivering attendant care (OR526) or relief care (OR507). A PSW or Agency providing this service **MUST** be authorized and bill for ADL/IADL Community Attendant Care or Relief Care during all transportation services delivered. Modifiers for this eXPRS procedure code include:

- WE: Community Access Transportation. This includes while supporting a person going out and participating in their community when Community Attendant Care or Relief Care supports are needed and authorized.
- WD: To/From Work or DSA Transportation. This includes while supporting a person to get to or from work, or their Day Support Activities (DSA) Program. This does NOT include any miles travelled during an employment or DSA service, nor between locations during the provision of those services, as those miles are already calculated into the employment or DSA service rate.

**Agency Provider Mileage (OR005)** is a per mile reimbursement for Agency Providers of Transportation Services. This per mile rate is a standalone rate and may not be billed during the delivery of any other service. Modifiers for this eXPRS procedure code include:

- WE: Community Access Transportation. Transportation support is generally provided by the residential provider as it is paid for in the residential service rate. In-home agencies typically will utilize OR004 mileage. This service is only to be utilized when an individual cannot access community transportation through their residential agency, or in-home agency and a different provider, authorized to provide transportation, is delivering the service. This service is not available without an ***ODDS approved exception***.
- WD: To/From Work or DSA Transportation. This includes transporting a person to or from work, or their Day Support Activities (DSA) Program.

**Transit Passes/Bus Passes (OR554)** is a payment made to purchase a bus or transit pass for the person to use while accessing and participating in their community or utilizing the bus pass for To/From Work or DSA Transportation.

**Commercial Transportation (OR003)** is for use when no other more cost-effective transportation solution exists. Typically, this is used for Taxi companies. The CDDP or Brokerage pays the company through an invoice process (established at the local level).

## Eligibility

### **People using In-Home Services**

Community transportation eligibility information for both adults and children who do not live in a residential setting can be found in the Ancillary Rule OAR 411-435-0050.

### **People using Residential Services**

Community transportation is part of the supports that a residential setting provider is responsible for providing to individuals who live in those settings. Separate from these services is transportation related to accessing employment and DSA. Individuals who live in a residential service setting may access To/From Work or DSA Transportation (OR005/WD) for support to/from work or DSA. Residential service settings are 24-hour residential, adult and children's foster homes, host homes, and supported living.

### **Youth Under Age 18**

Transportation for a child or youth under the age of 18 is typically a parental responsibility. Transportation for a child may be authorized in an ISP only in the following scenarios:

- During the delivery of daily relief care as described in OAR 411-450-0060; or
- When included as a behavior intervention strategy in a Positive Behavior Support Plan (PBSP). Transportation cannot be authorized for therapeutic rides or proactive strategies.
- To/From Work or DSA Transportation may be available for youth under 18 for the person to obtain a ride to or from work, **by exception**.

Community Transportation may be authorized when an individual has a need for transportation in any of the following ways:

- Community Transportation is needed to meet an assessed need during transportation or at the destination.
- Community Transportation is needed to get to and from a location where an individual is using ODDS-funded services, and a related goal is clearly written in the ISP.
- Community Transportation is needed to for the person to meet a goal or outcome clearly written in the ISP, but there is no funded service at the destination.

The Case Manager must authorize community transportation in the ISP before the service can be used. As part of the person-centered planning process case managers work with individuals and their ISP team to identify

community transportation needs to access supports and services. Documentation to support the authorization for transportation may include but not be limited to:

- Information that documents how the transportation service relates to the assessed ADL/IADL/Behavioral support need either during transportation or how ADL/IADL/Behavioral supports are required at the destination; or how transportation is needed to meet a goal in the ISP.
- Information that demonstrates the mode of transportation chosen is the most cost effective means possible.

This documentation would most commonly be found in related sections of the ISP or supporting documents. Additional documentation could be recorded in the ONA, PBSP, and progress notes.

### Exclusions

Community transportation cannot be authorized for the following purposes:

- Transportation during a day support activity. The cost of transportation during a DSA activity is included in the DSA rate.
- Transportation during any employment service. The cost of transportation during employment services is included in the employment service rates.
- When there are natural supports or community-based resources available at no cost to the individual.
- To and from a location that does not meet the desired outcomes or needs identified in the ISP; the individual does not have a need for supports, paid or unpaid; or the individual does not have ADL/IADL/Behavior support needs during transportation.
- To or from a location outside of the person's local community.

***Tip: The location should be to the nearest site that meets the need. However, infrequent trips outside of individual's community may be funded if the ISP team determines that traveling outside of the community is the most cost-effective solution to access a support need and it is identified in the ISP.***

- To and from medical appointments (generally covered under medical transportation that ODDS does not provide).
- Mileage for a vehicle owned, leased, or controlled by the individual or a person other than the paid provider. Paid provider includes vehicles owned, leased, or controlled by a DD Agency.

***\*PSWs or DSPs that use a vehicle owned by the individual or a person other than the paid provider are eligible to claim attendant care hours for time spent transporting the individual but cannot claim mileage. Medicaid payments can only be made to enrolled providers, and***

**reimbursement to a provider who is not financially responsible for the vehicle is not allowed.**

- Vacation costs for transportation, food, shelter, and entertainment that are normally incurred by a person on vacation, regardless of disability, and are not required by the individual's identified needs for ADL/IADL/Behavior supports in all home and community-based settings.
- Purely diversional purposes. Transportation should be related to a goal or need identified in the ISP.
- Additional exclusions in 411-435-0050(6).

### **Authorization Limits**

All transportation authorizations must be made using the most cost-effective means of transportation appropriate for the individual that also meets the individual's needs.

Case managers may authorize transportation when costs are under \$600/month in an ISP year. Case managers may only authorize transportation costs over \$600/month in an ISP year after receiving an **ODDS approved funding review decision** from ODDS. See [Funding Review and Exceptions Request Form DHS0514DD](#).

### **Requesting an exception for total monthly transportation amount above \$600 per month:**

The ISP team must review the individual's prior transportation usage, consider the individual's desired outcomes, needs, and preferences, as well as cost-effectiveness, and document in the request the following:

- Less expensive transportation options and alternatives explored to meet the individual's desired outcomes, needs, and preferences, and why the requested transportation option is being requested as most effective and necessary.
- The totals for all types of transportation used each month, per ride cost for taxi services, number of miles used monthly in which mileage service.
- Documentation in the ISP showing the support need for transportation, and how it is related to a goal in the ISP.
- Documentation showing the transportation is in the area commonly used by people in the same area to obtain the same types of goods and services.

## **In-Home**

When a PSW or In-Home Agency is being authorized for mileage (OR004), the PSW or In-Home Agency must also have an authorization for attendant care (OR526) or relief care (OR507). Mileage cannot be a standalone service for PSWs or In-Home Agencies. The provider must bill concurrently for hours and miles while the individual is in the vehicle. ADL/IADL Attendant Care Hours used while a provider is delivering mileage transportation are drawn down from the assessed hours.

## **Residential Services**

Transportation to the community to meet most of an individual's desired outcomes and identified needs are included in the rate paid to the provider for individuals receiving services in the settings below. Residential providers can meet the transportation needs of the individual receiving services from their agency or home in a manner that meets the person's preferences and desired outcomes. This can be through any combination of transportation options that the agency provides whether purchasing a bus pass or using the agency's vehicle.

Case managers are responsible for ensuring that the residential provider is meeting their responsibilities to meet the needs and assisting to work toward the individual's desired outcomes as identified in the ISP.

However, individuals using services in these settings are eligible to receive separately funded transportation, or To/From Work or DSA Transportation, to get to and from Employment and DSA.

- Residential Services (includes group homes, foster homes)
- Supported Living Services
- Host Home Services

To meet these needs, a person residing in these settings may be able to access a Bus/Transit Pass (OR554), Transportation Agency Mileage (OR005), or Taxi services (OR003). Documentation of the intent of the service authorization should support the need for access to/from work or DSA settings.

## **Supported Living Budgets**

For individuals receiving Supported Living services, an exception is required if the transportation costs included in the Supported Living budget exceed \$350. Transportation included in the Supported Living budget is intended to meet most of an individual's desired outcomes and identified needs in their

community. However, as outlined above, individuals using Supported Living Services are eligible to receive additional funded transportation to get to and from Employment and DSA. Additional Community Access Transportation may be requested through exception, but is still included in the residential services rate.

## Exceptions

Common funding exceptions include:

1. The amount of transportation services needed to meet a person's ISP goals exceeds the limits in the expenditure guidelines.
2. Youth under 18.
3. Local Match. If a person uses Local Match funded transportation, and the team is requesting to use an additional form of transportation to resolve an unmet need. For more information on Local Match, please review the local match [Worker's Guide](#).

For all exception requests, it is important to provide in the request a breakdown of the individual costs that result in the exceptional amount being requested.

For instance, if a person utilizes PSW Community Access and To/From Work or DSA miles, a bus pass, and an occasional taxi service for To/From Work, ODDS must see the cost breakdown:

PSW Miles: 800 miles @ \$0.56/mile = \$448.00

Bus Pass: \$27.50/month

Taxi Service: \$60 least expensive option for 4 rides per month =  
\$240.00

Total transportation costs = \$715.50

In this example, the total request is for \$715.50, not just the amount over the monthly limit of \$600.

## Service Monitoring

Case managers are responsible for monitoring the services authorized in an ISP to ensure that they are meeting the desired outcomes, needs, and preferences of the individual. Case managers should also monitor using the following principles related to cost-effective use of services for transportation claims:

- Ensure that services are being delivered at the location that is nearest to the individual within the community that meets the desired outcomes and

identified needs of the individual.

- Explore and determine if there are alternative options more cost- effective transportation to meet the person’s desired outcomes and identified needs.

### Calculating Agency Mileage for Transportation

Transportation Agency Mileage, previously DD53, reimbursement includes assumptions for agency administrative and overhead costs, as well as attendant care, already built into the rate. This rate is divided by the number of individuals in the vehicle and billed evenly per mile of the total length of the ride.

For example, “Provider A” is an enrolled transportation provider who transports 3 people in the morning to their DSA program. Rider X total miles from pick up to drop off is 16 miles.

Rider Y total miles from pick up to drop off is 24 miles, and Rider Z total miles from pick up to drop off is 10 miles. All three riders were in the vehicle at the same time, so the Provider divides the longest trip (24 miles) by the number of riders (3), and bills evenly for each rider:

Rider X=8 miles

Rider Y=8 miles

Rider Z=8 miles

ODDS has developed a tracking and calculation tool to help calculate and keep track of the miles transported, pick up and drop off locations, clients in the vehicle, vehicle used, and route/trip assigned. Although this tool will be very helpful in determining the accurate miles to bill for each person, its use is not required. It can be found on the ODDS web page by searching “Transportation Calculation Tool”, or by clicking [here](#).

What is required is for the Provider Agency to record and maintain records of the following:

- Pick Up Address for the Individual
- Drop Off Address for the individual
- Total miles traveled per individual
- Total number of individuals in the vehicle at any time
- Total miles driven from start to end of any route (i.e., from the first person who was picked up until the last person was dropped off)

Please refer to [PT-22-062](#) for more detailed information on the calculation tool.

Note: this tool is optional and not required.





## Frequently Asked Questions:

**Q:** Is it new guidance that mileage cannot be billed during DSA (OR542) services?

**A:** No. Employment and Day services were unbundled in 2014 and became discreet service rates, which have included assumptions for miles travelled during a service. If providers have concerns regarding the miles accounted for in the rates, provider surveys were conducted in the past, and will be conducted again for future rate assessments. We encourage all providers to participate in this process to ensure rates are adequate to support the valuable work they do.

**Q:** Can mileage be billed in conjunction with OR542(RS)/DSA Solo since that is a 1:1 service and the hourly provider agency rate for OR542(RS) is the same as the hourly provider agency rate for OR526/Attendant Care.

**A:** DSA Solo (OR542/RS) rate does include mileage, and therefore an additional mileage payment would not be allowed. In-home attendant care and DSA Solo are two distinctly different services and have different rate models. See the expenditure guidelines for more information.

**Q:** A DSA provider has stated they will only allow a certain number of miles during a service hour. Is this appropriate, and can we authorize additional transportation to cover activities further distance?

**A:** Our rate model does assume a certain number of miles per billable hour; however, these miles are generally considered an average among individuals. Some people may use more than the average, and some may use less. An additional authorization for transportation during DSA or Employment Service will not be authorized. A provider has the right to establish their own practices with how they will provide a service, and these discussions should be had within the planning process.

**Q:** Are foster care providers expected to provide transportation to or from DSA or work?

**A:** No. To/From Work or DSA Transportation is not bundled into any service rate. The intent is to allow for greater flexibility when identifying a transportation provider.

**Q:** A youth has found a job in the community, can we authorize To/From Work Transportation?

**A:** Youth under the age of 18 will need an exception to utilize To/From Work Transportation.

**Q:** Is there transportation funding allowed for paid parking?

**A:** ODDS cannot fund parking fees or reimburse for paid parking.

**Q:** The person receiving transportation has an infant child. Can they ride in the transport with the person?

**A:** The benefit and purpose for the transportation must be that of the ODDS service recipient. ODDS cannot fund additional fees for other riders; however, ODDS also does not prescribe that the only person in the vehicle must be a client of ODDS.

**Q:** Can a provider agency bill mileage when the person is no longer in the vehicle?

**A:** No. Transportation services can only be billed while the person is in the vehicle.

**Q:** The ISP team has exhausted all options to find transportation for a person to get to/from work. The least expensive option that will meet the needs of the person has been determined to be taxi services. If the total monthly cost of taxi services is less than the monthly limit of \$600, do we need an exception to authorize taxi rides?

**A:** No, unless the person receives local match funded transportation. If the purpose of the transportation is To/From Work or DSA Transportation, and the team has documented in the file that all other options are not able to meet the need, taxi services can be authorized locally up to the monthly limit of \$600.

**Q:** A person has Local Match funded transportation for to/from their work site. The Lyft is unable to serve their need for Saturday services due to their schedule. Are there options for To/From Work Transportation in this case?

**A:** Yes! Have the team complete an exception request as soon as possible stating that the person has Local Match funded transportation and describe in detail the reasons that Local Match funding is not able to meet all of their needs. Give a proposed solution and outline the costs associated for the funding review committee.

**Q:** A person needs to purchase an annual transit pass at a cost of \$888.00. For this once annual authorization, is an exception required since it will be a month more than \$600?

**A:** No. All transportation services can be averaged over a 12 month period. So for \$888.00 1x per year, the monthly cost is \$74. The authorization in eXPRS

should be for the annual amount, but the SC/PA must be aware that \$74 of the \$600 monthly budget has already been paid/allocated. Remaining transportation services must be limited to an average of \$526/month ( $\$600 - \$74 = \$526$ ).

**Q:** For individuals in Residential or Adult Foster Care, we can only authorize transportation to and from DSA or work, correct? Not for other individual goals in their ISP that they may need transportation for, correct?

**A:** Correct. Community Access Transportation is bundled into the rate for the residential services.

**Q:** A person living in an adult group home wants to utilize a bus pass to get to and from work. What is needed to authorize this?

**A:** All people in residential services can be authorized for a bus pass in order to get to or from Work or a DSA service. Transportation may be authorized if related to a goal in the ISP. Documentation in the ISP is required to identify that the purpose or intent of the service is for the person to access DSA or Work. Bus passes may not be authorized for Community Access Transportation as that type of transportation is included in the residential service rate.

**Q:** A supported living client needs transportation to/from work and DSA. Are the miles that are in the Supported Living budget counted against the total community transportation that can be authorized?

**A:** No. The \$350 in the supported living budget is part of the residential service rate. Because of this, the person has access to the full monthly allotment of \$600 for To/From Work or DSA Transportation.

**Q:** What about Supported Living? If transportation is in the SL budget, the only additional transportation is for DSA/work correct?

**A:** That is correct.

**Q:** Is the mileage (OR005) tracked for each individual or per group? For example, person 1 and 2 live in the same home and are going to the same place, would we track mileage for them individually or together?

**A:** Mileage will be tracked individually, but if the rides are taken together then the miles are split between them.

Example:

Stephanie and Melanie both live at ABC Adult Foster Home, and both attend the same Day Program for the same times and days each week. The trip from home to the DSA site is 10 miles, and 10 miles back home.

They both ride for 20 miles each day, and if they are the only two people in the vehicle during both trips, then we would divide the miles evenly between the two.

However, let's say on the way home another person rode in the car with them from the DSA Program and the driver dropped off Stephanie and Melanie, but drove 1 more mile to drop off the third person. Now the "Total Miles" between the two trips is 21 miles, but they need to be factored separately.

Trip to DSA: 10 miles, 2 riders, each billed 5 miles

Trip Home: 11 miles (we have to count the extra mile, even if Stephanie and Melanie weren't in the vehicle at the time because they shared the 'ride'), 3 riders, each billed 3.7 miles.

**Q:** A person found a job on their own and is not receiving paid supports at work. He lives in an adult foster home and wants to use OR005 mileage to get to and from work. Is an exception needed?

**A:** No, an exception is not needed. To/From Work or DSA Transportation mileage is not paid in the foster home rate, and therefore can be authorized separately. The person does not need to be receiving paid supports at the destination to utilize ODDS funded transportation services. Transportation may be used if related to a support need during transportation.

## **Forms/References:**

[Transportation Agency Calculation Tool](#) can be found on the ODDS web page.

Community Transportation (Non-Medical): Local Match Worker's Guide:

<https://www.oregon.gov/odhs/providers-partners/idd/workerguides/community-transportation-local-match.pdf>

## **Contact(s):**

**Name:** Regional Employment Specialists:

<https://www.oregon.gov/odhs/employment-first/Documents/map-odds-regional-employment-specialists.pdf>