



## 70.2.100 Non-Emergency Medical Transportation and Non-Medical Transportation Services

Policy ID: 427378

Published Date: 01/31/2022  
Compliance Date: 11/01/2015

Policy Entity: Promise Health Plan  
Plan/Group Type:

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### Policy Statement

NA

### Purpose

To outline the requirements for delivering Non-Emergency Medical Transportation (NEMT) and Non-Medical Transportation (NMT) services for Medi-Cal and Cal MediConnect including utilization management process for authorizing NEMT service requests, as well as NMT public and private service requests and reimbursements.

### Scope

Medical Care Solutions - Medical Care Programs and Utilization Management, Customer Care, and Appeals & Grievances. Medi-Cal and Cal MediConnect.

### Roles and Responsibilities

NA

### Definitions

NA

### Policy

#### Policy

Blue Shield of California Promise Health Plan (Blue Shield Promise) will comply with guidance in the *DHCS All Plan Letter 17-010 (Revised): Non-Emergency Medical and Non-Medical Transportation Services* for Medi-Cal enrollees and *DHCS Duals Plan Letter 18-001: Non-Emergency Medical and Non-Medical Transportation Services* for Cal MediConnect enrollees.

### ***Non-Emergency Medical Transportation (NEMT)***

NEMT is a covered benefit when a member needs to obtain medically necessary covered services and when prescribed in writing via a Physician Certification Statement form (PCS).

Medically appropriate NEMT services via ambulance, litter van, wheelchair van or air are provided when the member's medical and/or physical condition does not allow for transport by ordinary means of public or private transportation.

Authorization shall be given for the lowest cost type of medical transportation that is adequate for the member's medical needs and is available at the time transportation is required. In most cases transportation shall be authorized only to the nearest facility capable of meeting the patient's medical needs. There shall be no limits to receiving NEMT services as long as the member's medical services are medically necessary and the NEMT has prior authorization via a PCS form.

#### ***NEMT Physician Certification Statement (PCS)***

The *Request for NEMT – PCS* form must be completed and submitted before NEMT services can be authorized and provided to the member. Effective November 2021, Blue Shield Promise implemented a revised *Request for NEMT – PCS* form to combine the Treatment Authorization Request (TAR) and PCS into a single form.

The following exceptions do not need a *Request for NEMT – PCS* form:

- NEMT services provided to a member being transferred from an acute care hospital, immediately following an inpatient stay at the acute level of care, to a skilled nursing facility or an intermediate care facility licensed pursuant to Section 1250 of the Health and Safety Code.
- NEMT services provided to a donor for a Major Organ Transplant (MOT).

The *Request for NEMT – PCS* form shall include the following components:

- **Function Limitations Justification:** Physician is required to document the member's limitations and provide specific physical and medical limitations that preclude the member's ability to reasonably ambulate without assistance or be transported by public or private vehicles.
- **Dates of Service Needed:** Provide start and end dates for NEMT services; authorizations may be for maximum of 12 months.
- **Mode of Transportation Needed:** List the mode of transportation that is to be used when receiving these services (ambulance/gurney van, litter van, wheelchair van or air transport).
- **Certification Statement (PCS):** Prescribing physician's statement certifying that medical necessity was used to determine the type of transportation being requested.

Blue Shield Promise shall not modify an NEMT authorization once the treating physician prescribes the form of transportation on the *Request for NEMT – PCS* form.

#### ***NEMT Vehicle Types***

Blue Shield Promise will provide the following four available modalities of NEMT transportation:

- **Ambulance:** Ambulances are generally used for emergencies but may provide qualified recipients NEMT transport for certain situations including:
  - Transfers between facilities for recipients who require continuous intravenous medication, medical monitoring, or observation.
  - Transfers from an acute care facility to another acute care facility.
  - Transport for recipients who have recently been placed on oxygen (does not apply to recipients with chronic emphysema who carry their own oxygen for continuous use).
  - Transport for recipients with chronic conditions who require oxygen if monitoring is required.
- **Litter Van:** Transport by litter van is appropriate when a recipient's medical and physical condition does not meet the need for NEMT ambulance services, but meets both of the following:
  - Requires that the recipient be transported in a prone or supine position, because the recipient is incapable of sitting for the period of time needed to transport.
  - Requires specialized safety equipment over and above that normally available in passenger cars, taxicabs, or other forms of public conveyance.

- **Wheelchair Van:** Transport by wheelchair van is appropriate when a recipient's medical and physical condition does not meet the need for litter van services, but meets any of the following:
  - Renders the recipient incapable of sitting in a private vehicle, taxi, or other form of public transportation for the period of time needed to transport.
  - Requires that the recipient be transported in a wheelchair or assisted to and from a residence, vehicle, and place of treatment because of a disabling physical or mental limitation.
  - Requires specialized safety equipment over and above that normally available in passenger cars, taxicabs, or other forms of public conveyance.
  - Members with the following conditions may qualify for wheelchair van transport when their providers submit a signed *Request for NEMT - PCS* Form:
    - Members who suffer from severe mental confusion.
    - Members with paraplegia.
    - Dialysis recipients.
    - Individuals with chronic conditions who require oxygen, but do not require monitoring.
- **Air:** Transport by air is appropriate only under the following conditions:
  - When transportation by air is necessary because of the member's medical condition or because practical considerations render ground transportation not feasible. The necessity for transportation by air shall be substantiated in a written order of a physician, dentist, podiatrist, or mental health or substance use disorder provider.

### ***Non-Medical Transportation (NMT)***

NMT is a covered benefit for members to obtain all Medi-Cal services, including specialty mental health, substance use disorder, dental, and any other benefits delivered through the Medi-Cal FFS delivery system. NMT is provided for members to obtain medically necessary services, pick up drug prescriptions that cannot be mailed directly to the member, or pick up medical supplies, prosthetics, orthotics, and other equipment. Members using a wheelchair may utilize NMT services if they are able to ambulate without assistance from the driver.

NMT includes round trip transportation by passenger car, taxicab, or other form of public or private conveyance, as well as mileage reimbursement for medical purposes when conveyance is in a private vehicle arranged by the member and not through a transportation broker, bus passes, taxi vouchers or train tickets.

A PCS is not required for NMT.

Blue Shield Promise's transportation vendor provides NMT services to Blue Shield Promise members. Authorization is not required from Blue Shield Promise for members to schedule NMT with the Blue Shield Promise Transportation vendor.

NMT coverage includes transportation for the member and one attendant, such as a parent, guardian, or spouse, to accompany the member in a vehicle or on public transportation.

#### **Public conveyance**

Upon member request, Blue Shield Promise shall provide round trip transportation for medical purposes for members requesting bus passes, taxi vouchers or train tickets.

#### **Private conveyance**

Private conveyance is transportation via a privately owned vehicle arranged by the member. This can include the member's personal vehicle, or that of a friend or family member. This does not include vehicles that are connected to businesses, such as Uber or Lyft. The member must attest to the plan in person, electronically or over the phone that other transportation resources have been reasonably exhausted. In order to receive gas mileage reimbursement for use of a private vehicle, the driver must be compliant with California driving requirements, which include valid driver's license, valid vehicle registration and valid vehicle insurance.

### ***Minors***

Unless otherwise provided by law, NEMT and NMT transportation are provided for a parent or guardian when the member is a minor. With the written consent of a parent or guardian, NEMT or NMT services may be arranged for a minor who is unaccompanied by a parent or guardian. When state or federal law does not require parental consent, transportation will be provided for unaccompanied minors. All necessary written consent forms must be received prior to arranging transportation for an unaccompanied minor.

### ***Major Organ Transplant (MOT)***

Blue Shield Promise will cover a Major Organ Transplant (MOT) donor's transportation at the request of the MOT donor or the MOT recipient. A PCS form is not required for MOT donors requesting NEMT services.

### **Procedure**

#### ***NEMT Authorization Request Process – Utilization Management***

The *Request for NEMT – PCS* form is available for providers to download on the Blue Shield Promise website. A copy may also be requested from Blue Shield Promise Customer Care Operations or Blue Shield Promise's transportation vendor.

Transportation requests are received by the Utilization Management department from the requesting provider. If the Blue Shield Promise Customer Care Operations department receives a request, it is forwarded to the Utilization Management department.

The intake staff creates an authorization request record in the authorization system, attaches the *Request for NEMT – PCS* form and reviews the request.

- If the *Request for NEMT – PCS* form is complete and meets all required criteria (i.e., medical necessity, lowest cost type of medical transportation):
  - The request is approved.
  - An authorization is sent to the transportation vendor in a daily extract file.
  - Letters are sent to the member and requesting provider.
- If the *Request for NEMT – PCS* form is incomplete or does not meet required criteria:
  - The request is pended.
  - A fax is sent to the requesting provider detailing the missing or invalid criteria.
  - If the provider submits an updated *Request for NEMT – PCS* form, it will be re-processed.

#### ***NEMT/NMT Transportation Vendor: Scheduling, Cancellations and Mobile Application***

##### **Scheduling**

Members may schedule NEMT and NMT transportation by contacting the Blue Shield Promise transportation vendor or Blue Shield Promise Customer Care Operations at least 24 hours in advance. A caregiver can also schedule a ride on behalf of the member if they have the necessary member eligibility and ride information. Blue Shield Promise transportation vendor is available 24 hours a day, seven days a week. Same day transportation may be provided if the appropriate type of vehicle is available. All transportation reservations will be logged in the transportation vendor's system.

The following information is gathered to process the transportation scheduling request:

- Member's eligibility and demographics
- Origin and destination
- Appointment date and time
- Wheelchair specifics if wheelchair is used
- Number of additional passengers (if any)
- Member's preferred return trip type (will call/scheduled time) if round trip

For NEMT services, if a valid authorization with PCS is not in the designated transportation documentation system, the transportation vendor's representative will educate the member about the requirement and send the member's provider a *Request for NEMT – PCS* form which must be completed prior to scheduling the member's ride.

##### **Cancellations**

Members shall call Blue Shield Promise transportation vendor at least 24 hours prior to the scheduled pickup time. Members will be notified of this 24-hour cancellation policy upon scheduling their transportation. All transportation cancellations will be logged in the designated transportation documentation system. If a member has had three consecutive no shows or late cancellations, a prompt will display in the transportation vendor's designated transportation system. The representative will educate the member on the important of cancelling their reservations with at least 24 hours' notice if they are unable to make their appointment. Transportation representative will also work with the member to reschedule their reservation(s) if needed.

#### Mobile application

Members who are booking ambulatory or wheelchair on demand services may choose to download the transportation vendor's mobile application on iOS or Android via their app store to schedule a new reservation, review upcoming reservations, rate their ride, contact the transportation vendor's call center, or cancel an existing reservation. Members with standing reservation orders or utilizing NEMT gurney or ambulance services may not utilize the mobile application at this time.

### ***NMT Public and Private Conveyance Requests and Reimbursements***

#### NMT Public Conveyance Requests

Members requesting an up-front bus pass, taxi voucher, or train ticket may contact Blue Shield Promise Customer Care. Blue Shield Promise Customer Care Operations will assist the member in fulfilling their request. If a member makes this type of request to the Blue Shield Promise transportation vendor, the representative shall warm transfer the member to Blue Shield Promise Customer Care Operations. Blue Shield Promise Customer Care Operations shall report public conveyance transportation requests as they occur to the Blue Shield Promise transportation vendor oversight team including confirmation of the type (bus pass, taxi voucher, train ticket), date of service, and the \$ amount.

#### NMT Public and Private Conveyance Reimbursement Process

A member may submit request for reimbursement to the Blue Shield Promise transportation vendor, Blue Shield Promise Customer Care Operations or Blue Shield Promise Appeals & Grievances department (A&G).

If the request is received by the Blue Shield Promise transportation vendor or Blue Shield Promise Customer Care, a representative shall forward the request for NMT reimbursement via secure email to the Blue Shield Promise A&G email box with an email copy to Blue Shield Promise transportation vendor oversight.

A&G will capture the member's self-attestation that other transportation resources have been reasonably exhausted all other transportation options. The attestation may include that the member:

- Has no valid driver's license
- Has no working vehicle available in the household
- Is unable to travel or wait for medical or dental services alone
- Has a physical, cognitive, mental, or developmental limitation
- Used private conveyance due to a scheduled NMT ride from Blue Shield Promise transportation vendor not showing up within the scheduled pickup window

For gas mileage reimbursement for use of a private vehicle, A&G will validate that the driver was compliant with California driving requirements (i.e., valid driver's license, valid vehicle registration and valid vehicle insurance) as part of the member attestation.

A&G shall provide reimbursement within 30 days. For private conveyance, the mileage reimbursement will be issued to the driver, not the member, and shall be consistent with the Internal Revenue Service standard mileage rate for medical transportation.

A&G shall report reimbursement requests as they occur to the Blue Shield Promise transportation vendor oversight team including confirmation of the attestation (for NMT private conveyance), date of service, and the reimbursement amount.

### ***Monitoring and Oversight***

#### Member Expressions of Dissatisfaction

All member expressions of dissatisfaction shall be submitted to Blue Shield Promise Appeals & Grievances department for review and processing. If this is received by the Blue Shield Promise transportation vendor or Blue Shield Promise Customer Care, a representative shall forward it via secure email within one business day to the Blue Shield Promise A&G email box with an email copy to Blue Shield Promise transportation vendor oversight.

#### Vendor Oversight

The Blue Shield Promise transportation vendor oversight team monitors the services provided by the Blue Shield Promise transportation vendor for compliance with the Blue Shield transportation vendor services agreement through monthly Joint Operation Committee meetings, quarterly audits, and reporting which shall include:

- Call Center
  - Telephone response time: Average speed to answer
  - Abandoned call rate
  - Call blockage rate
  - Language assistance
- Transportation
  - Itemized member rides
  - Reservation order fulfillment rate
  - Punctuality rate
  - Grievance rate
  - Member program satisfaction, subject to member survey receiving regulatory approval

The Blue Shield Promise transportation vendor shall have documented call scripts as well as policies and procedures for delivery of NEMT and NMT services. The transportation vendor shall include itemized details with each invoice.

The Blue Shield Promise transportation vendor shall provide updated list of all subcontractors on at least an annual basis to the Blue Shield Promise transportation vendor oversight team.

#### Quality Assurance

Blue Shield Promise requires that all individuals utilizing transportation services are assured with all safety measures, which must include but is not limited to the below reports, certifications, and training:

- Driver credentialing
- Subcontractor credentialing
- Driver identity checks on OIG website
- Social Security Card
- Driver's License
- 7 Panel Drug Screen
- National Criminal Background Check
- National Sex Offender Search
- Motor Vehicle Record
- CPR Training
- First Aid Training
- AED Training
- Defensive Driving Training
- Passenger Assistance and Safety Training
- Wheelchair Securement Training
- Vehicle Certification (vehicle registration, biannual vehicle inspection)
- Health and Safety protocols including COVID-19 specific safety protocols

#### NEMT PCS Compliance

The Blue Shield Promise transportation vendor oversight team and the Utilization Management team shall monitor monthly compliance of authorizations issued with *Request for NEMT – PCS* forms, and rides occurring with *Request for NEMT – PCS* forms.

NEMT referral reports will be reported to the Blue Shield Promise Medical Services Committee, Medi-Cal Rhythm of the Business, and Medi-Cal Committee.

Data Submission

NEMT and NMT data will be submitted to DHCS as required.

**REFERENCES**

- APL 17-010 (revised 9/8/2020)
- DPL 18-001

**References**

Reference Type	Name
Policies	•
Additional Related Policies	•
Standards	•
Frameworks & Regulations	•
Accrediting/Regulatory Body	•
Line of Business Impacted	•
Regulatory Product Type	•

**Contact Information**

If you have questions about this policy, contact

**Revision History**

Summary of Changes	Version #	Published Date	Approver
Consolidated UM and CC policies CC policy 10.3.21 retired.		01/31/2022	
Off cycle revisions were made to call on the correct for to request NEMT Changed policy LOB to ALL (10.2.44 became 70.2.100)		12/27/2021	
Minor changes to include specific department process, list system names, and correct document titles.		07/26/2021	
Removed mention of exemption related to higher level of care specialty		04/26/2021	
NA		04/27/2020	

Change Care1st template to Promise		04/29/2019	
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