



Department  
of Health

# Early Intervention Transportation Guidance

Early Intervention Coordinating Council Meeting

September 24, 2020

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## Background

Early Intervention Program (EIP) services are defined to include transportation and other related costs that are necessary to enable an eligible child and the child's family to receive early intervention services (10 NYCRR section 69-4.1(m)(2)(xix)).

Transportation costs have historically been reimbursed to the municipalities as an administrative cost. In accordance with Medicaid State Plan Amendment (SPA) 18-39, at the request of CMS, transportation will no longer be considered an administrative cost and will be reimbursed for each one-way trip, as non-emergency medical transportation (NEMT) at the Medicaid rate.



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## Current Transportation Process

- Municipalities contract with transportation vendors at a rate agreed upon by the county and the vendor. There are no standard rates.
- If a parent is providing transportation, they are reimbursed for mileage by the county at the federal reimbursement rate.
- The counties are reimbursed at 100% for costs reported under Medicaid Administrative costs and at 49% by the state, for children who are non-Medicaid eligible.
- The current reimbursement process does not specify what is being reimbursed, e.g. dates, type of trips. This results in a lack of accountability in the Medicaid Administrative drawdown.
- CMS requested a change from Administrative to fee-for-service (FFS) reimbursement; this change was addressed by Medicaid SPA 18-39.



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## Changes in Transportation Process – 2020

- Effective November 1, 2020, counties may add in the use of a Medicaid Transportation Manager (MTM) for transportation of children who are Medicaid eligible.
- The ongoing service coordinator (OSC) or service provider will contact the MTM to coordinate transportation.
- The MTM is responsible for scheduling and issuing a prior approval for each trip.
- When using the MTM, Medicaid requirements apply. The family must have an attestation form signed by their physician.
- Claiming will be done outside the EI system (currently NYEIS) for each one-way trip, as non-emergency medical transportation (NEMT).



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## Future Process for Transportation

- Effective on the date of Go Live for the EI-Hub, early intervention transportation will be reimbursed for each one-way trip at the rates established under the Preschool Supportive Health Services Program (PSHSP). These rates are included in approved SPA 18-39 for use for early intervention (EI) transportation.
- These rates will be updated upon completion of a transportation cost study by PCG, review by the Department, and approval by the Division of the Budget.
- Counties may continue to contract with vendors at a negotiated rate.
- For children without Medicaid coverage, counties will be reimbursed at 49% of the current rate used for Preschool Supportive Health Services Program (PSHSP) transportation.



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## Claiming Transportation for Medicaid-Eligible Children

- If a child is Medicaid eligible, claiming should be done through the regional Medicaid Transportation Manager (MTM) to the maximum extent possible.
- Transportation can only be billed on a day that a Medicaid reimbursable early intervention service other than transportation was delivered and may only be billed at the rate for each one-way trip.
- The ongoing service coordinator (OSC) or provider will contact the MTM to coordinate transportation. The MTM is responsible for scheduling and issuing a prior approval for each trip.



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## Claiming Transportation for Medicaid-Eligible Children

- Medicaid requires use of the most medically appropriate and cost effective alternative when considering transportation options. This would include reimbursement for use of public transportation or reimbursement of parents, where appropriate, and included in the Individualized Family Service Plan (IFSP).
- If a Medicaid transportation provider is being used, the provider will be reimbursed at the Medicaid rate (outside of the EIP) and reimbursement will be captured in eMedNY.
- Under circumstances where the MTM cannot be utilized for a Medicaid eligible child, the municipalities may coordinate transportation using one of their contracted vendors (e.g., bus companies), to provide transportation. The municipality, as the biller of record, would then submit their invoices through the EI data system to be submitted to Medicaid for reimbursement at the Medicaid reimbursement rate for early intervention transportation.



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## Authorization for EIP Transportation Services

- Documentation requirements to support claims for transportation services in the EIP will be consistent regardless of payer.
- To be reimbursable:
  - The family must have an attestation form signed by their physician;
  - The need for non-emergency medical transportation (NEMT) must be documented in the child's individualized family service plan (IFSP).
  - The transportation must also be authorized by the EIO/D in the EI data system.



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## Required Documentation

Whether transportation is being provided by a Medicaid vendor, a parent, or by a vendor contracted by the municipality for a child in the EIP, each one-way trip must be documented in accordance with Medicaid record keeping requirements, as follows:

- The family must have an attestation form signed by the Physician;
- The NEMT must be documented in the child's IFSP;
- The NEMT must be authorized by the EIO/D in the EI billing system;
- Bus/Transportation logs must be kept and must include the following:
  - ✓ The child's name;
  - ✓ Both the origination of the trip and time of pickup;
  - ✓ Both the destination of the trip and time of drop off;
  - ✓ Bus number or the vehicle license plate number; and,
  - ✓ The full printed name of the driver providing the transportation.

Providers are urged to maintain a record with all information listed above to support claims for Medicaid and non-Medicaid transportation services.



## Questions?

