MEDICAID POLICY INFORMATION SHEET

Policy Analyst: Lida Momeni Phone Number: 517-284-1215 Final X Public Comment | X Initial 📗 Brief description of policy: MDHHS will allow flexibility related to Medicaid Fee-for-Service NEMT medical verification, authorization and forms. Additionally, this policy will suspend prior authorization and reimbursement requirements for CSHCS. Reason for policy (problem being addressed): Federal law at 42 CFR 431.53 requires Medicaid to ensure necessary transportation for beneficiaries to and from services that Medicaid covers. The purpose of this guidance is to announce temporary policy changes regarding NEMT to protect the health and welfare of beneficiaries and providers while maintaining access to vital services during the COVID-19 pandemic. These changes aim to prevent barriers to NEMT and the spread of COVID-19. **Budget implication:** budget neutral will cost MDHHS , and (select one) budgeted in current appropriation will save MDHHS Is this policy change mandated per federal requirements? No. Does policy have operational implications on other parts of MDHHS? Yes, local MDHHS county offices and the Program Review Division. Does policy have operational implications on other departments? Local Health Departments as result of CSHCS policy suspensions. **Summary of input:** controversial acceptable to most/all groups limited public interest/comment **Supporting Documentation:** State Plan Amendment Required: X Yes Public Notice Required: Yes ⊠ No No If Yes, please provide status: Approved Pending Denied If yes, Approval Submission Date: Date: Date:

1/18 Policy Info Sheet

DRAFT FOR PUBLIC COMMENT						
Michigan Department of Health and Human Services		Project Number: 202	8-NEMT	Date: April 29, 2020		
Comments Due: Proposed Effective Date: Direct Comments To: Address: E-Mail Address:	June Mare Lida N/A mon	e 3, 2020 ch 1, 2020 Momeni	Fax	·		
Policy Subject: COVID-19 Response: Non-Emergency Medical Transportation (NEMT)						
Affected Programs: Medicaid, Healthy Michigan Plan, MIChild, Children's Special Health Care Services (CSHCS)						
Distribution: Bridges Eligibility Manual (BEM) and Bridges Administrative Manual (BAM) Holders, Medicaid NEMT Contractor, Local Health Departments						
Summary: The Michigan Department of Health and Human Services (MDHHS) will allow flexibility related to Medicaid Fee-for-Service NEMT medical verification, authorization and forms. Additionally, this policy will suspend prior authorization and reimbursement requirements for CSHCS.						
Purpose: Federal law at 42 CFR 431.53 requires Medicaid to ensure necessary transportation for beneficiaries to and from services that Medicaid covers. The purpose of this guidance is to announce temporary policy changes regarding NEMT to protect the health and welfare of beneficiaries and providers while maintaining access to vital services during the COVID-19 pandemic. These changes aim to prevent barriers to NEMT and the spread of COVID-19.						
Cost Implications: Budget neutral.						
Potential Hearings & Appeal Issues: None anticipated.						
State Plan Amendment Required: Yes No Description Notice Required: Yes No Submitted Notice Required: Yes No Submitted Notice Required: Yes No Notice Required: Yes Notice Require						
Tribal Notification: Yes ⊠ No □ - Date:						
THIS SECTION COMPLETED BY RECEIVER						
Approved		<u> </u>	o Comments			
			See Comments Below See Comments in Text			
Signature:			Phone Num			
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Signature Printed:	
Bureau/Administration (please print)	Date

Comment001 Revised 6/16



Bulletin Number: MSA 20-23

Distribution: Bridges Eligibility Manual (BEM) and Bridges Administrative Manual

(BAM) Holders, Medicaid Non-Emergency Medical Transportation

(NEMT) Contractor, Local Health Departments

Issued: April 29, 2020

Subject: COVID-19 Response: Non-Emergency Medical Transportation (NEMT)

Effective: March 1, 2020

Programs Affected: Medicaid, Healthy Michigan Plan, MIChild, Children's Special Health

Care Services

Per Centers for Disease Control and Prevention (CDC) and State recommendations, social distancing is encouraged to slow the spread of COVID-19 and thus preserve the health system capacity for the duration of this pandemic. Minimizing face-to-face contact whenever possible is strongly encouraged. These temporary policy changes offer flexibility for providers to meet the needs of beneficiaries through alternative means while protecting the health and welfare of both parties.

The purpose of this guidance is to announce temporary policy changes regarding nonemergency medical transportation (NEMT) to protect the health and welfare of beneficiaries and providers while maintaining access to vital services during the COVID-19 pandemic. Consistent with public health emergency conditions at both the state and federal level related to COVID-19, MDHHS is issuing this policy effective March 1, 2020. Given the circumstances, this policy is intended to be time-limited, and MDHHS will notify providers of its termination.

Refer to the Michigan Department of Health and Human Services (MDHHS) Medicaid Provider Manual for policy information regarding Medicaid Fee-for-Service (FFS) transportation policy. For services for Medicaid beneficiaries enrolled in a Medicaid Health Plan (MHP), Integrated Care Organization (ICO) or MI Choice Waiver agency, the beneficiary's health plan or waiver agency should be contacted for policy and coverage information. The Medicaid Provider Manual is available on the MDHHS website at www.michigan.gov/medicaidproviders >> Policy, Letters & Forms.

Medical Verification, Reimbursement and Prior Authorization for FFS Medicaid

MDHHS will waive the requirement of least costly mode of transportation, depending on availability. Authorizing parties must continue to schedule transportation appropriate for the beneficiary's needs, at a minimum. If a mode of transportation surpasses a beneficiary's minimum needs, the authorizing party can schedule the mode of transportation if it is the only available option.

The completion of a Medical Verification for Transportation form (DHS-5330) will be waived for special transportation, round trip and mileage rates over the FFS Medicaid rate schedule, and transportation reimbursement requests for medical care outside a beneficiary's community when comparable care is locally available. Special transportation includes medically necessary wheelchair lift-equipped vehicles, Medi-Vans, or medically necessary attendants. A Medical Transportation Statement (MSA-4674) can be completed via telephone and signed through verbal attestation. Authorizing parties will accept the submission of DHS-5330 and MSA-4674 forms via email and fax.

All prior authorization requests must be faxed to the MDHHS Program Review Division (PRD). Local MDHHS county offices must fax requests to 517-241-7813. Local MDHHS county offices without access to a fax machine can email requests to MDHHS-PRD-NEMT@michigan.gov. (Refer to the Non-Emergency Medical Transportation chapter of the Medicaid Provider Manual, Prior Authorization section, for prior authorization requirements.)

Children's Special Health Care Services

CSHCS will temporarily suspend the following NEMT policy requirements for travel that takes place during the COVID-19 outbreak:

- Prior approval for NEMT assistance has been obtained. Travel still needs to be approved by the local health department, but requests can be submitted after the travel has taken place.
- Requests for NEMT reimbursement must be received by MDHHS within 90 days following the authorized month of travel to be considered for payment. Families are encouraged to submit the reimbursement request as soon as possible in order to assure timely payment.

Public Comment

The public comment portion of the policy promulgation process is being conducted concurrently with the implementation of the change noted in this bulletin. Any interested party wishing to comment on the change may do so by submitting comments to Lida Momeni, Policy Specialist, via e-mail at:

E-mail: MomeniL@michigan.gov

Please include "COVID-19 Response: Non-Emergency Medical Transportation (NEMT)" in the subject line.

Comments received will be considered for revisions to the change implemented by this bulletin.

Manual Maintenance

Information is time-limited and will not be incorporated into any policy or procedure manuals.

Questions

Any questions regarding this bulletin should be directed to Provider Inquiry, Department of Health and Human Services, P.O. Box 30731, Lansing, Michigan 48909-8231, or e-mailed to ProviderSupport@michigan.gov. When you submit an e-mail, be sure to include your name, affiliation, NPI number, and phone number so you may be contacted if necessary. Providers may phone toll-free 1-800-292-2550.

Approved

Kate Massey, Director

Medical Services Administration