

Non-Emergency Medical Transportation (NEMT)

An introduction to the NEMT program and Washington State Apple Health

Overview

The purpose of this document is to provide clarification regarding Medicaid requirements for non-emergency medical transportation (NEMT), and to help providers determine whether Medicaid-paid transportation may be available for eligible clients to access providers of covered services.

As Washington's single state Medicaid agency, the Health Care Authority (HCA) is solely responsible for administering any Medicaid-funded program or service ([See 42 CFR 431.10](#)). The HCA provides NEMT in accordance with federal Medicaid regulations, including [42 CFR 431.53](#) which requires that the [Medicaid State Plan](#) ensure necessary transportation for clients to and from providers to receive covered services, and describe the methods that the agency will use to meet this requirement.

Background

The [Deficit Reduction Act of 2005](#) allowed for states to obtain Medicaid matching funding at the federal medical assistance percentage (FMAP) when administering the NEMT services using transportation brokers. Requirements for using brokers are found at [42 CFR 440.170](#), and include competitive procurements and eliminating conflicts of interest. The Centers for Medicare and Medicaid Services (CMS) requires a comprehensive state plan amendment (SPA)

which describes how NEMT services will be procured and provided to clients.


The NEMT SPA includes the eligible client groups and lists the types of transportation modes which brokers can authorize. CMS limits transportation to individuals who have no other means of transportation, and excludes coverage of NEMT for school-based services. Since Medicaid is always the payer of last resort, any other program which provides or has a requirement to provide a client's transportation must be used first.

It is important to note that changes to the State Plan Amendments, Programs, or Waivers may affect the benefit for Non-Emergency Medical Transportation (NEMT). Please contact the NEMT program to discuss potential impact to clients.

The Washington State NEMT Program

As allowed by federal regulations and in accordance with the NEMT SPA, HCA contracts with six transportation brokers who serve 13 geographic regions and cover all 39 counties in Washington State. Some brokers serve single-county regions, and others serve multi-county regions. These brokers are experienced with the transportation resources and the needs of the communities they serve.

In addition to federal requirements, state regulations (Washington Administrative Code or WAC) govern how the brokered transportation



program operates. Refer to [WAC 182-546-5000 through 182-546-6200](#). In general, NEMT is covered if the following conditions are met:

- The client is eligible for a medical assistance program included in the State Plan;
- The health care service, for which the trip is needed, must be a Medicaid-covered service (within the scope of coverage of the client's benefit services package);
- The health care service must be medically necessary;
- The health care service must be delivered by an authorized provider;
- The trip is to a local provider, unless there is an allowable exception;
- The trip is authorized in advance by the transportation broker;
- The client must use personal transportation resources first; and
- The trip is the lowest-cost available transportation mode (or alternative), that is both accessible to the client and appropriate for the client's medical condition and personal capabilities (i.e. bus, sedan/lift-equipped vehicle, etc).

Apple Health Clients

If you are an individual, a family member, an advocate, or a healthcare provider, and you want to arrange transportation for an eligible client to travel to/from their healthcare service provider, contact the regional transportation broker for the client's county of residence. Refer to the [NEMT website](#) (lodging and related expenses may be available when medically necessary and prior authorized).

New Service Providers

NEMT brokers contract directly with transportation service providers. If you are interested in becoming a transportation service provider, contact the [regional transportation broker](#) that is responsible for the counties where you want to do business. If you are interested in becoming a contracted transportation broker with the HCA, please refer to the following websites for information about future postings of state procurement processes and agency contracts:

<http://des.wa.gov/about/pi/ProcurementReform/Pages/default.aspx>

<https://fortress.wa.gov/ga/webs/> .

Guidance for Prospective Providers

Please answer the following questions regarding your program or service you are planning to provide so that HCA NEMT staff can best assist you:

1. Is the health care service covered in the [Medicaid State Plan](#) for Washington? Please provide section and page number(s) for reference.
2. Is the health care service covered by the [Revised Code of Washington](#) (RCW)? Please provide the RCW Title reference.
3. Is the health care service covered in the [Washington Administrative Code](#) (WAC)? Please provide the WAC chapter and section(s).
4. Was there recent legislation which authorized the health care service as a new Medicaid service in Washington State? Please provide [Legislative Session](#) and bill number.

5. Does the service fit into an existing Medicaid State Plan benefit? See [Attachment 3](#) of the Medicaid State Plan for Categorically Needy (CN) and Medically Needy (MN) services.
6. Is the service considered a medical or a social service?
7. Is the service a new benefit? New Medicaid benefits must fall under the federal guidelines for mandatory or optional Medicaid benefits.
8. How are services billed? Describe your billing process.
 - a. Do you have billing codes?
 - b. Do you bill through the ProviderOne system?
 - c. Will the provider bill other insurers in addition to Medicaid?
9. Is transportation included in your rate structure? If transportation is built into the rates structure then the entity providing the medical services is responsible for providing transportation to clientele. NEMT would not be available under this scenario.
10. How are services delivered to clients? Describe the service delivery process.
11. For which client populations do you provide services? Do they include Medicaid and dual-eligible (Medicaid and Medicare) clients? Medicaid funds are used to fund NEMT transportation.
12. Are the providers of your health care services professionally licensed or credentialed? CMS requires providers to be professionally licensed or credentialed. [See 42 CFR 440.1 through 440.185](#). If not licensed or credentialed, then refer to the

information provided on the [Department of Health \(DOH\)](#) website.

Health care providers can [apply](#) to become a Washington State Medicaid provider with the HCA. The HCA reimburses enrolled eligible providers for covered medical services, equipment, and supplies they provide to eligible clients.

13. Do any other states include transportation in their State Plan for the service you would like to provide?

Questions

For additional assistance with determining if clients served by your program are eligible for NEMT transportation or if you would like to know more about the NEMT program in general please visit our [Client](#) or [Provider](#) websites.

You can also email NEMT program staff directly at [Transportation Services](#).

For general questions regarding [Washington State Apple Health](#) (Medicaid) please contact the Health Care Authority Customer Service Center at: 1-800-562-3022