

MEDICAID POLICY INFORMATION SHEET

Policy Analyst: Lida Momeni

Phone Number: 517-284-1215

Initial

Public Comment

Final

Brief description of policy:

This policy aligns meal reimbursement requirements with the State of Michigan Standardized Travel Regulations, changes prior authorization (PA) requirements for meals and lodging for overnight stays, and revises timely filing requirements.

Reason for policy (problem being addressed):

This policy will allow local MDHHS county offices to authorize meals and lodging for overnight stays up to 14 days without submitting a PA request to the MDHHS Program Review Division. MDHHS will apply tax liability requirements imposed by the Internal Revenue Service (IRS) and State of Michigan Standardized Travel Regulations issued by the Civil Service Commission and Michigan Department of Technology, Management and Budget across all programs, including Medicaid non-emergency medical transportation (NEMT).

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?

Yes, MDHHS will apply IRS requirements to Fee-for-Service NEMT reimbursements.

Does policy have operational implications on other parts of MDHHS?

Yes, the Program Review Division and local MDHHS county offices.

Does policy have operational implications on other departments?

No.

Summary of input:

- controversial
- acceptable to most/all groups
- limited public interest/comment

Supporting Documentation:

State Plan Amendment Required: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Public Notice Required: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes, please provide status: <input type="checkbox"/> Approved <input type="checkbox"/> Pending <input type="checkbox"/> Denied	If yes, Submission Date:
Date: Approval	Date:

DRAFT FOR PUBLIC COMMENT Michigan Department of Health and Human Services		
	Project Number: 1923-NEMT	Date: August 9, 2019

Comments Due: September 13, 2019
Proposed Effective Date: November 1, 2019
Direct Comments To: Lida Momeni
Address: Program Policy Division/MDHHS/MSA/CCC 7th Floor
E-Mail Address: Momenil@michigan.gov
Phone: 517-284-1215 **Fax:** 517-241-8969

<p>Policy Subject: Meals, Lodging, and Timely Filing of the Medical Transportation Statement</p> <p>Affected Programs: Medicaid, Healthy Michigan Plan, MICHild</p> <p>Distribution: Bridges Eligibility Manual (BEM) and Bridges Administrative Manual (BAM) Holders, Medicaid Non-Emergency Medical Transportation (NEMT) Contractor</p> <p>Summary: This policy aligns meal reimbursement requirements with the State of Michigan Standardized Travel Regulations, changes prior authorization requirements for meals and lodging for overnight stays, and revises timely filing requirements.</p> <p>Purpose: This policy will allow local MDHHS county offices to authorize meals and lodging for overnight stays up to 14 days without submitting a PA request to the MDHHS Program Review Division. MDHHS will apply tax liability requirements imposed by the Internal Revenue Service (IRS) and State of Michigan Standardized Travel Regulations issued by the Civil Service Commission and Michigan Department of Technology, Management and Budget across all programs, including Medicaid non-emergency medical transportation (NEMT).</p> <p>Cost Implications: Budget neutral</p> <p>Potential Hearings & Appeal Issues: None anticipated</p>

State Plan Amendment Required: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, date submitted:	Public Notice Required: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Submitted date:
--	---

Tribal Notification: Yes No - Date:

THIS SECTION COMPLETED BY RECEIVER

<input type="checkbox"/> Approved	<input type="checkbox"/> No Comments
<input type="checkbox"/> Disapproved	<input type="checkbox"/> See Comments Below
	<input type="checkbox"/> See Comments in Text

Signature:	Phone Number
-------------------	---------------------

Signature Printed:

Bureau/Administration <i>(please print)</i>	Date
--	-------------

Proposed Policy Draft

Michigan Department of Health and Human Services
Medical Services Administration

Distribution: Bridges Eligibility Manual (BEM) and Bridges Administrative Manual (BAM) Holders, Medicaid Non-Emergency Medical Transportation (NEMT) Contractor

Issued: October 1, 2019 (Proposed)

Subject: Meals, Lodging, and Timely Filing of the Medical Transportation Statement

Effective: November 1, 2019 (Proposed)

Programs Affected: Medicaid, Healthy Michigan Plan, MICHild

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

Meals

FFS NEMT meal reimbursement will align with the State of Michigan Standardized Travel Regulations issued by the Michigan Civil Service Commission and Michigan Department of Technology, Management and Budget. Meals authorized for beneficiaries, volunteer drivers, and individuals with a vested interest must meet one of the following:

- For breakfast: The vehicle must depart before 6:00 AM and must return after 8:30 AM.
- For lunch: The vehicle must depart before 11:30 AM and must return after 2:00 PM.
- For dinner: The vehicle must depart before 5:30 PM and must return after 8:00 PM.

A vehicle's departure and return times cannot include non-medically related travel including, but not limited to, personal errands or business. Meals are not eligible for reimbursement if they are purchased within the requester's official city of residence.

Lodging

Medically necessary overnight stays that include meals and lodging may be authorized for a beneficiary, a transportation provider, and one medically necessary attendant (or individual with a vested interest) if documented by the beneficiary's provider on the DHS-5330, for up to 14 consecutive nights. Medically necessary overnight stays beyond 14 nights require prior authorization (PA) from the MDHHS Program Review Division (PRD). (Refer to the Non-Emergency Medical Transportation chapter of the Medicaid Provider Manual, Prior Authorization section, for prior authorization instructions.) The least expensive, sufficiently maintained lodging available must still be utilized.

Timely Filing of the Medical Transportation Statement

Currently, a Medical Transportation Statement (MSA-4674) must be returned to the MDHHS local office within 90 calendar days from the last date of service to authorize payment for medical transportation. To align with MDHHS timely filing billing requirements, the MSA-4674 timely filing requirement will be expanded to within 12 months of the incurred expense.

FFS NEMT reimbursement will align tax liability requirements imposed by the Internal Revenue Service (IRS). NEMT payment is non-taxable when an MSA-4674 is submitted to the MDHHS local office up to 60 calendar days after the expense is incurred (day trip meals are always taxable). Providers and beneficiaries that seek NEMT reimbursement after 60 calendar days of the incurred expense will see their payment taxed. To allow the MDHHS local office enough time to process reimbursement requests, beneficiaries and providers should submit requests within 45 calendar days after the expense is incurred. The next edition of MSA-4674 will include these instructions.