



JENNIFER KENT  
DIRECTOR

State of California—Health and Human Services Agency  
Department of Health Care Services



EDMUND G. BROWN JR.  
GOVERNOR

CCT PL #16-011

Date: May 31, 2016  
To: CCT Program Director  
Subject: Reimbursement for California Community Transitions (CCT)-related  
Transportation Costs

**POLICY EFFECTIVE ON: 06/01/16**

## PURPOSE

This CCT Policy Letter (PL) includes information on:

- Non-emergency Medical Transportation (NEMT) for Medi-Cal members;
- CCT-related NEMT for CCT Enrollees;
- CCT-related, non-emergency, non-medical transportation (NENMT) for CCT Enrollees; and
- Instructions on how to submit requests for reimbursement for CCT-related transportation, prior to the day of transition.

## BACKGROUND

Money Follows the Person (MFP) grantees (MFP is known as CCT in California) are required to ensure Person-Centered Planning (PCP) and informed decision-making principles and practices are at the center of the transition and care planning process, including the selection of community-based housing. One of the greatest challenges in the planning process is the identification of affordable and accessible housing that meets the needs and preferences of the CCT Enrollee.

NEMT is sometimes required to enable CCT Enrollees to view potential housing, complete or obtain legal paperwork, attend or secure an intake appointment with a community physician, etc. However under Medi-Cal, NEMT (i.e., medical transportation such as ambulance, wheelchair van, or stretcher van) is only authorized when ordinary public or private conveyance is not possible, nor advisable, because of the individual's medical need(s), and transportation is required for obtaining needed **medical care**.

Although reimbursement for the transportation (both medical and non-medical) of CCT Enrollees was not authorized in the past, DHCS recognizes that viewing potential housing options, in person, and securing a community physician, prior to transition, is sometimes necessary to provide a Person-Centered, safe, and sustainable transition. Fortunately, under the Deficit Reduction Act (DRA) of 2005, MFP grantees have the flexibility to:

Eliminate barriers or mechanisms ... that prevent or restrict the flexible use of Medicaid funds to enable Medicaid-eligible individuals to receive support for appropriate and necessary long-term services in the settings of their choice.<sup>1</sup>

Therefore, while the use of NEMT is restricted to the transportation of inpatient residents to and from medical appointments under California's approved State Plan; under the CCT Demonstration, CCT Lead Organizations (LOs) may be authorized to receive reimbursement for CCT-related pre-transition NEMT costs, **if all** of the following conditions are met:

1. Transportation is required to:
  - a. view and/or apply for housing,
  - b. obtain legal documentation that requires the CCT Enrollee to complete it in person, or
  - c. attend an intake appointment with a community physician;
2. The individual is eligible for Medi-Cal on the date of service;
3. The individual's Initial Transition and Care Plan (ITCP) and 100-hour Treatment Authorization Request (TAR) have been approved; and
4. The lowest cost type of transportation that is adequate for the CCT Enrollee's medical need(s) is selected (California Code of Regulations (CCR) Title 22, Section 51323[b]).<sup>2</sup>

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<sup>1</sup> PUBLIC LAW 109-171—FEB. 8, 2006; DEFICIT REDUCTION ACT OF 2005; CHAPTER 6—OTHER PROVISIONS; Subchapter B—Money Follows the Person Rebalancing Demonstration; SEC. 6071.

<sup>2</sup> Medical Transportation – Ground

[http://files.medi-cal.ca.gov/publications/masters-mtp/part2/mctrangnd\\_a05.doc](http://files.medi-cal.ca.gov/publications/masters-mtp/part2/mctrangnd_a05.doc)

## PROCESS

To bill for allowable CCT-related pre-transition transportation costs (for both NEMT and NENMT), CCT LOs must complete the *Request for CCT-related Pre-transition Transportation Authorization* form (Attachment 2). This form must be retained in the case file.

The CCT LO may submit claim(s) for reimbursement to the Medi-Cal Fiscal Intermediary (FI) using the Home Set-up service code, **T2038 HT**.

Billing for CCT-related Pre-transition costs are **NOT** allowed for CCT Participants living in the community.

→ CCT LOs must ensure arrangements are in place for on-going access to necessary home and community-based (HCB) services and supports in the community as long as the member remains eligible for Medi-cal. Post transition transportation services should be billed to Medi-Cal fee-for-service or the Medi-Cal Managed Care Plan.

### Reimbursement

CCT-related pre-transition NEMT (public and private transportation) will be reimbursed under home set-up service code, **T2038 HT**; providing **all** of the following conditions are met:

- CCT-related pre-transition NENMT for **private** transportation will be reimbursed based on the personal vehicle mileage reimbursement rate established by the Internal Revenue Service (IRS). The current reimbursement rate for 2016 is 54 cents per mile. The annually-adjusted reimbursement rate is reassessed at the beginning of each year. Gasoline and routine automobile repair expenses are not reimbursable.
- A copy of the driver's valid state driver's license, car registration, and insurance coverage must be retained for private NENMT.
- The following restrictions will apply to reimbursable, private NENMT:
  - ▶ The cost of meals and/or lodging will not be reimbursed;
  - ▶ Out-of-State travel expenses will not be reimbursed;
  - ▶ Only the following mileage is eligible for reimbursement:
    1. Travel from headquarters<sup>3</sup> to the beneficiary's current residence,
    2. Necessary CCT-related travel with the beneficiary, and

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<sup>3</sup> "Headquarters" is defined as the place where the CCT LO staff spends the largest portion of their working time and is where they return upon the completion of assignments.

3. Travel from the beneficiary's current residence back to headquarters.

- CCT-related Pre-transition NENMT for **public** and **commercial** transportation will be reimbursed for the actual cost of the service. Supporting documentation must be kept in case file.
- Supporting documentation for all CCT-related pre-transition transportation costs, (e.g., service receipts, mileage log / MapQuest printout, parking receipts, bridge tolls, etc.) must adhere to documentation retention requirements within the 2014-2016 CCT LO Contract:
  - B. Contractor shall maintain for review and audit and supply to DHCS upon request, adequate documentation of all expenses claimed pursuant to this Agreement to permit a determination of expense allowability.
  - C. If the allowability or appropriateness of an expense cannot be determined by DHCS because invoice detail, fiscal records, or backup documentation is nonexistent or inadequate according to generally accepted accounting principles or practices, all questionable costs may be disallowed and payment may be withheld by DHCS via written request to the FI. Upon receipt of adequate documentation supporting a disallowed or questionable expense, reimbursement may resume for the amount substantiated and deemed allowable.<sup>4</sup>

A reference table has been included as an Attachment to this PL to illustrate the differences between the two categories of CCT-related pre-transition transportation: medical and non-medical.

## QUESTIONS

For further information about this PL, please contact Karli Holkko, at (916) 322-5253, or by e-mail at: [karli.holkko@dhcs.ca.gov](mailto:karli.holkko@dhcs.ca.gov).

Sincerely,

*(Originally signed by)*

Rebecca Schupp, Chief  
Long-Term Care Division

Attachments (2)

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<sup>4</sup> 2014-2016 CCT Lead Organization Contract, Exhibit B, Provision 2: Expense Allowability / Fiscal Documentation, Provision 2, subparagraphs B. and C.