

# IHCP *bulletin*

INDIANA HEALTH COVERAGE PROGRAMS    BT2024136    AUGUST 27, 2024

## Differences clarified between HCBS Transportation service under PathWays Waiver and NEMT service

The Office of Medicaid Policy and Planning (OMPP) clarifies the differences between the Home- and Community-Based Services (HCBS) Transportation service provided to Indiana PathWays for Aging (PathWays) Waiver members and the nonemergency medical transportation (NEMT) service available to PathWays program members.

### HCBS Transportation service – PathWays Waiver

This HCBS Transportation service is available to participants who have an active PathWays Waiver. This service enables participants served under the PathWays Waiver to gain access to waiver and other nonmedical community services, activities and resources, specified by the service plan.

Transportation services through the PathWays Waiver are reimbursed as two types of service:

- Level 1 – Nonassisted Transportation – The participant does not require mechanical assistance to transfer in and out of the vehicle.
- Level 2 – Assisted Transportation – The participant requires mechanical assistance to transfer into and out of the vehicle.



Nonmedical transportation is billed as a combination of a base trip code and a mileage code. Providers must bill a base trip and mileage code together.

*Table 1 – PathWays Waiver HCBS nonmedical transportation billing information*

| Service   | Code  | Mod 1 | Mod 2 | Mod 3 | Modifier descriptions                       |
|---|-------|-------|-------|-------|---|
| Nonmedical Transportation Nonassisted (Base Trip) | T2003 | U7    | U1    | UB    | U7=Waiver<br>U1=Nonassisted<br>UB=Base Trip |
| Nonmedical Transportation Nonassisted (Mileage)   | T2003 | U7    | U1    |       | U7=Waiver<br>U1=Nonassisted                 |
| Nonmedical Transportation Assisted (Base Trip)    | T2003 | U7    | U2    | UB    | U7=Waiver<br>U2=Assisted<br>UB=Base Trip    |
| Nonmedical Transportation Assisted (Mileage)      | T2003 | U7    | U2    |       | U7=Waiver<br>U2=Assisted                    |

Providers that are approved to provide transportation under the PathWays Waiver must follow these documentation standards:

- Identify need in the service plan.
- Outline services in the service plan.
- Document that the provider meets and maintains the requirements for providing services under *Indiana Administration Code 455 IAC 2*; documentation maintained by the provider or its agent.
- Specify applicable (if any) limits on the amount, frequency or duration of this service.



Transportation services provided under the PathWays Waiver must not duplicate transportation services provided under the Indiana Medicaid State Plan or any other waiver service. Other transportation activities not allowed under the PathWays Waiver include services provided to participants receiving services in Adult Family Care and Assisted Living settings.

The PathWays managed care entities (Anthem, Humana or UnitedHealthcare) or Gainwell Technologies reimburse transportation claims when the following conditions are met:

- An approved service authorization includes the waiver transportation service.
- The provider is an approved provider to deliver waiver transportation services.
- The participant is not receiving services in Adult Family Care and Assisted Living settings.

More details, as well as provider qualifications for Transportation waiver services, are presented in Table 21 of the [OMPP HCBS: Indiana PathWays for Aging Waiver](#) provider reference module at [in.gov/medicaid/providers](https://in.gov/medicaid/providers).

### **Nonemergency medical transportation service – PathWays program**

NEMT is a covered service under the Indiana Medicaid State Plan for all PathWays members. The Indiana Health Coverage Programs (IHCP) reimburses NEMT for members to get to or from an IHCP-covered service from an IHCP-attested provider. NEMT services are intended to assist members in accessing medical appointments due to a lack of transportation or insufficient resources to cover travel expenses. NEMT services occur when needs are not immediate, such as scheduled appointments, dialysis, chemotherapy, physical therapy, primary care or specialist visits, and picking up prescriptions.

The NEMT service is managed either through the state's contracted broker or through the MCE's contracted broker. For most NEMT trips, the provider must be part of the broker's provider network and must submit all claims to the appropriate broker to receive reimbursement. Some NEMT services are carved out of the brokerage model (see *IHCP Bulletin BT2024119*).

For additional information about NEMT services, see the [Transportation Services](#) provider reference module.

### **Summary**

[Table 2](#) summarizes the two different transportation services available to PathWays members: the HCBS Transportation service available through the PathWays Waiver and the NEMT service available to PathWays program members. Table 2 is not an all-inclusive summary of differences. See the [Transportation Services](#) and [OMPP HCBS: Indiana PathWays for Aging Waiver](#) provider reference modules for more information.

*Table 2 – Summary of differences between HCBS Transportation and NEMT services*

|                               | <b>HCBS Transportation<br/>(PathWays Waiver)</b>   | <b>NEMT<br/>(PathWays Medicaid Health Plan)</b>   |
|-------------------------------|--|---|
| <b>Purpose</b>                | To enable participants served under the waiver to gain access to waiver and other nonmedical community services, activities and resources, specified by the service plan   | To provide transportation to and from IHCP-covered services, provided by IHCP-attested providers <ul style="list-style-type: none"> <li>• The transportation provided must be the least expensive type of transportation that meets the medical needs of a member.</li> <li>• Additionally, trips are expected to follow the shortest, most efficient route to and from the appointment.</li> </ul> |
| <b>Eligibility</b>            | Individuals enrolled in the PathWays Medicaid health plan and who also receive waiver services through the HCBS PathWays Waiver <ul style="list-style-type: none"> <li>• Transportation services must follow a written service plan addressing specific needs determined through the assessment process.</li> <li>• Transportation service provided through the waiver, must be provided by an FSSA-approved transportation agency and in combination with all other PathWays waiver services except to participants who receive Adult Family Care or Assisted Living services.</li> </ul> | Individuals enrolled in the PathWays Medicaid health plan   |
| <b>Services Covered</b>       | Trips to and from community activities, employment, adult day services and other nonmedical appointments as specified in the member’s service plan   | Trips to and from IHCP covered services such as dialysis, chemotherapy, physical therapy, primary doctor or specialist visits, picking up prescriptions, hospital discharges to home and so forth   |
| <b>Allowable Activities</b>   | Under the PathWays Waiver, Transportation trips do not need to be a trip to an IHCP provider: <ul style="list-style-type: none"> <li>• Attendance at adult day services</li> <li>• Visits to community centers or senior centers</li> <li>• Participation in volunteer work or employment</li> <li>• Trips to grocery stores, pharmacies and other essential errands</li> <li>• Social outings, such as visiting friends or family, attending religious services, or participating in community events</li> </ul>  | Under the PathWays program, NEMT trips must be to an IHCP provider: <ul style="list-style-type: none"> <li>• Medical appointments</li> <li>• Trips to drop off/pick up prescription medications</li> <li>• Dental appointments</li> </ul>   |
| <b>Activities Not Allowed</b> | <ul style="list-style-type: none"> <li>• Services provided to participants receiving Adult Family Care or Assisted Living waiver services</li> <li>• Services available through the Indiana Medicaid State Plan</li> </ul>   | <ul style="list-style-type: none"> <li>• Nonmedical trips</li> <li>• Trips to non-IHCP-attested providers</li> <li>• Trips for noncovered IHCP services</li> </ul>  |
| <b>Service Types</b>          | <ul style="list-style-type: none"> <li>• Level 1 – Nonassisted Transportation</li> <li>• Level 2 – Assisted Transportation</li> </ul>  | <ul style="list-style-type: none"> <li>• Ambulatory transportation</li> <li>• Nonambulatory transportation</li> <li>• Basic life support (BLS) services (nonbrokered)</li> <li>• Advanced life support (ALS) services (nonbrokered)</li> <li>• Family Member mileage reimbursement</li> </ul>   |
| <b>Flexibility</b>            | Greater flexibility in terms of destinations, focusing on enhancing overall quality of life and community engagement   | Limited to medical-related transportation; does not cover nonmedical community activities   |
| <b>Coordination</b>           | Coordinated through the person-centered assessment and service plan development by PathWays Waiver service coordinator   | Managed through Medicaid transportation brokers, excluding those services that are carved out.  |
| <b>Funding Source</b>         | HCBS waiver  | Indiana Medicaid State Plan   |

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