



## **Policy and Procedures for Non-Emergency General and Medical Transportation Services**

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### **I. Authority**

The *Policy and Procedures for Non-Emergency General and Medical Transportation Services* is based on the James Zadroga 9/11 Health and Compensation Act of 2010 (“Act”)<sup>1</sup> and the World Trade Center (WTC) Health Program’s administrative regulations.<sup>2</sup>

### **II. Policy**

The WTC Health Program offers coverage to its members for medical monitoring, initial health evaluation for survivors, and medically necessary treatment for a certified WTC-related health condition, and health conditions medically associated with a certified WTC-related health condition, including primary and specialty outpatient treatment (including diagnostic testing), pharmaceuticals, acute hospitalization, and post-acute care services.<sup>3</sup>

On a case-by-case basis, the WTC Health Program may also provide coverage for certain non-emergency, general transportation services for travel over 250 miles for members assigned to the Nationwide Provider Network (NPN), and for medically necessary, non-emergency medical transportation services, in accordance with this *Policy and Procedures for Non-Emergency General and Medical Transportation Services* and the WTC Health Program’s Administrative Manual.<sup>4</sup>

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<sup>1</sup> Pub. L. 111-347, as amended by Pub. L. 114-113, Title I codified at 42 U.S.C. §§ 300mm to 300mm-61.

<sup>2</sup> 42 C.F.R. Part 88.

<sup>3</sup> See WTC Health Program: Policy and Procedures at <https://www.cdc.gov/wtc/policies.html>

<sup>4</sup> See <https://www.cdc.gov/wtc/ppm.html>

### **III. Coverage of Non-Emergency General Transportation Services, and Expenses Incident to Non-Emergency General Transportation Services, for Members Assigned to the NPN<sup>5</sup>**

#### **A. Coverage**

The WTC Health Program may provide members assigned to the NPN coverage of expenses for necessary and reasonable, non-emergency general transportation services,<sup>6</sup> and those expenses that are incident to the necessary and reasonable, non-emergency general transportation.<sup>7</sup> This transportation must be for the purpose of the member securing medically necessary treatment for a certified WTC-related health condition, or a health condition medically associated with a certified WTC-related health condition.

In addition, the travel must exceed 250 miles roundtrip from either the member's place of residence or a WTC Health Program-affiliated facility or office, to a WTC Health Program-affiliated facility or office.<sup>8,9</sup> Travel is reimbursed according to General Services Administration (GSA) rates and practices. To obtain authorization for non-emergency, general transportation services, the NPN member must have a Prior Authorization in place that meets all requirements set forth by the WTC Health Program.<sup>10</sup>

#### **B. Scope and Authorization**

In determining the scope and authorization for non-emergency general transportation services for NPN members, the WTC Health Program relies on provisions pertaining to medical reimbursement for non-emergency general

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<sup>5</sup> See 42 U.S.C. § 300mm-22(b)(4)(C) ("The WTC Program Administrator may provide for necessary and reasonable transportation and expenses incident to the securing of medically necessary treatment through the nationwide network under section 3313 involving travel of more than 250 miles and for which payment is made under this section in the same manner in which individuals may be furnished necessary and reasonable transportation and expenses incident to services involving travel of more than 250 miles under regulations implementing section 3629(c) of the Energy Employees Occupational Illness Compensation Program Act of 2000 (title XXXVI of Public Law 106–398; 42 U.S.C. 7384t(c)."); see also 42 C.F.R. § 88.2(b).

<sup>6</sup> The term "non-emergency general transportation services" means the mode of transportation that is provided to the NPN member, e.g., automobile, bus, train, airplane, by the Program.

<sup>7</sup> "Expenses that are incident to the necessary and reasonable, non-emergency general transportation" means meals, lodging, or certain other expenses that are necessary to effectuate a successful transport. For detailed information on travel expenses, including expenses incident to non-emergency general transportation, see instructions found in the WTC Health Program's Administrative Manual at <https://www.cdc.gov/wtc/ppm.html>.

<sup>8</sup> The WTC Health Program may provide coverage, on a case-by-case basis, of travel between NPN-affiliated offices or facilities in the same trip where both are greater than 250 miles roundtrip from the member's residence.

<sup>9</sup> See 42 U.S.C. § 300mm-22(b)(4)(C); 42 C.F.R. § 88.2(b).

<sup>10</sup> See <https://www.cdc.gov/wtc/ppm.html>

transportation services contained in regulations<sup>11</sup> and procedures<sup>12</sup> of the U.S. Department of Labor, Office of Workers' Compensation Programs (OWCP), implementing section 3629(c) of the Energy Employees Occupational Illness Compensation Program Act of 2000 (Title XXXVI of Pub. L. 106-398; 42 U.S.C. § 7384t(c)).

**C. Determination of Whether Non-Emergency General Transportation Services Are Necessary and Reasonable**

To obtain authorization for general transportation, the NPN Clinical Director or designee shall submit a Prior Authorization request to the WTC Health Program asking for coverage of expenses for non-emergency, general transportation services, and any expenses that are incident to the non-emergency, general transportation services.

The WTC Health Program will review the medical justification from the NPN Clinical Director and determine whether transportation is necessary and reasonable<sup>13</sup> to treat a member's certified WTC-related health condition, or a health condition medically associated with the member's certified WTC-related health condition. For detailed authorization procedures, see instructions found in the WTC Health Program's Administrative Manual.<sup>14</sup>

**IV. Coverage of Medically Necessary, Non-Emergency Medical Transportation Services for Clinical Center of Excellence (CCE) and NPN Members**

**A. Coverage**

1. For those CCE or NPN members who are unable to access care services provided by the WTC Health Program without the aid of medical transport, the WTC Health Program may provide coverage of expenses for medically necessary, non-emergency medical transportation services for a roundtrip not to exceed 120 miles.
2. These expenses must be for the purpose of the member accessing medically necessary treatment from a CCE or NPN-affiliated provider for

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<sup>11</sup> See 20 C.F.R. § 30.404 ("Will OWCP pay for transportation to obtain medical treatment?").

<sup>12</sup> See "Medical Expense Reimbursement for Extended Travel" (Chapter 29.17), in *Federal Energy Employees Occupational Illness Compensation Program Act (EEOICPA) Procedure Manual* at [https://www.dol.gov/owcp/energy/regs/compliance/PolicyandProcedures/procedure\\_manual\\_1.0-2017.04.pdf](https://www.dol.gov/owcp/energy/regs/compliance/PolicyandProcedures/procedure_manual_1.0-2017.04.pdf).

<sup>13</sup> A determination of whether extended travel is "necessary and reasonable" is based on the strength of the medical evidence, i.e., whether the treatment "essential" to the care of the member, and whether the cost of the extended travel is not excessive.

<sup>14</sup> See <https://www.cdc.gov/wtc/ppm.html>.

a certified WTC-related health condition, or health condition medically associated with a certified WTC-related health condition.<sup>15</sup>

3. The WTC Health Program will only cover medically necessary, non-emergency medical transportation services by ambulette or ambulance when the Program determines that no other means of transportation could be used without posing a threat to the member's survival or seriously endangering the member's health.<sup>16</sup>

## **B. Exclusions**

The WTC Health Program will not cover expenses incident to medically necessary, non-emergency medical transportation services for a CCE or NPN-assigned member.<sup>17</sup>

## **C. Scope and Authorization**

In determining the scope and authorization for medically necessary, non-emergency medical transportation services<sup>18</sup> for a WTC Health Program member assigned to a CCE or a NPN, the Program relies, in part, on the transportation services provisions contained in regulations and procedures of the U.S. Department of Health and Human Services, Centers for Medicare and Medicaid Services.<sup>19</sup>

## **D. Determination of Whether Non-Emergency Medical Transportation Services are Medically Necessary**

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<sup>15</sup> 42 U.S.C. § 300mm-22(b)(4)(A).

<sup>16</sup> CMS guidelines pertaining to transport by ambulance require that "... the patient's condition is such that use of any other method of transportation is contraindicated. In any case in which some means of transportation other than an ambulance could be used without endangering the individual's health, whether or not such other transportation is actually available, no payment may be made for ambulance services... the presence (or absence) of a physician's order for a transport by ambulance does not necessarily prove (or disprove) whether the transport was medically necessary." See *Medicare Benefit Policy Manual, Chapter 10 – Ambulance Services, Section 10.2.1* at <https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/bp102c10.pdf>.

<sup>17</sup> "Expenses that are incident to the necessary and reasonable, non-emergency general transportation" means meals, lodging, or certain other expenses that are necessary to effectuate a successful transport. For detailed information on travel expenses, including expenses incident to non-emergency general transportation, see instructions found in the WTC Health Program's Administrative Manual at <https://www.cdc.gov/wtc/ppm.html>.

<sup>18</sup> The term "non-emergency medical transportation services" means transport by ambulette or ambulance of the member from the member's place of residence to a WTC Health Program-affiliated healthcare facility or office, for treatment of a certified WTC-related health condition, or a health condition medically associated with a certified WTC-related health condition. The term "ambulette" means a specially equipped van for transporting disabled or convalescent passengers in nonemergency circumstances.

<sup>19</sup> See *Medicare Benefit Policy Manual, Chapter 10 – Ambulance Services* at <https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/Downloads/bp102c10.pdf>.

1. The CCE or NPN Clinical Director or designee shall provide a Prior Authorization for non-emergency, medical transportation based on the medical necessity for such service.
2. The CCE or NPN shall maintain copies of the Prior Authorization in the member's record.
3. All claims for non-emergency, medical transportation involving ambulance and ambulance services will be audited by the WTC Health Program within six months of a request for reimbursement.
4. If the member requires more than two roundtrips in a 30-calendar day period or a roundtrip greater than 120 miles, the CCE or NPN Clinical Director or designee shall submit the Prior Authorization request, including medical justification, to the WTC Health Program.
5. The WTC Health Program will review submitted Prior Authorization requests and the medical justification from the CCE or NPN Clinical Director and determine whether the non-emergency, medical transportation services are medically necessary to treat a member's certified WTC-related health condition, or a health condition medically associated with a member's certified WTC-related health condition.<sup>20</sup> For detailed authorization procedures, see instructions found in the WTC Health Program's Administrative Manual.<sup>21</sup>

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<sup>20</sup> See 42 U.S.C. § 300mm-22(b)(4)(A).

<sup>21</sup> See <https://www.cdc.gov/wtc/ppm.html>.