Repetitive, Scheduled Non-Emergent Ambulance Transport Prior Authorization Model

Operational Guide

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1 – Purpose

The Repetitive, Scheduled Non-Emergent Ambulance Transport Prior Authorization Model is authorized by section 1834(l)(16) of the Social Security Act (the Act), as added by section 515(b) of Medicare Access and CHIP Reauthorization Act of 2015 (Pub. L. 114-10). It establishes a process through which a request for provisional affirmation of coverage is submitted for review before the service is furnished to a beneficiary and before the claim is submitted for payment. Prior authorization helps to make sure that applicable coverage, payment and coding rules are met before services are rendered.

The purpose of this Operational Guide is to interpret and clarify the prior authorization process for Medicare participating ambulance suppliers when rendering repetitive, scheduled non-emergent ambulance transports to Medicare Fee-for-Service beneficiaries. These guidelines aim to provide operational guidance and do not alter the requirements set forth in Title 42 of the Code of Federal Regulations (CFR) §410.40(e) and in applicable Local Coverage Determinations and Local Coverage Articles found at https://www.cms.gov/medicare-coverage-database/new-search/search.aspx.
2 - Repetitive, Scheduled Non-Emergent Ambulance Transport Medicare Benefit

For any service to be covered by Medicare it must:

A. Be eligible for a defined Medicare benefit category,
B. Be reasonable and necessary for the diagnosis or treatment of illness or injury or to improve the functioning of a malformed body member, and
C. Meet all other applicable Medicare statutory and regulatory requirements.

The medical necessity requirements for Medicare coverage of ambulance services are set forth in 42 CFR §410.40(e). Medicare covers ambulance services including air ambulance (fixed wing and rotary wing), when:

A. Furnished to a beneficiary whose medical condition is such that other means of transportation are contraindicated.
B. The beneficiary’s condition must require both the ambulance transportation itself and the level of service provided in order for the billed service to be considered medically necessary.

In addition to the medical necessity requirements, the service must meet all other Medicare coverage and payment requirements, including requirements relating to the origin and destination of the transportation, vehicle and staff, and billing and reporting. Additional information about Medicare coverage of ambulance services can be found in 42 CFR §§410.40, 410.41, and in the publication 100-02 Medicare Benefit Policy Manual, Chapter 10.

Non-emergent transportation by ambulance is appropriate if either:

A. The beneficiary is bed-confined and it is documented that the beneficiary’s condition is such that other methods of transportation are contraindicated; or,
B. The beneficiary’s condition, regardless of bed confinement, is such that transportation by ambulance is medically required. Thus, bed confinement is not the sole criterion in determining the medical necessity of ambulance transportation. It is one factor that is considered in medical necessity determinations.1

For a beneficiary to be considered bed-confined, the following criteria must be met: 2

A. The beneficiary is unable to get up from bed without assistance.
B. The beneficiary is unable to ambulate.
C. The beneficiary is unable to sit in a chair or wheelchair.

A repetitive ambulance service is defined as medically necessary ambulance transportation that is furnished three or more times during a ten-day period; or at least once per week for at least

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1 42 CFR §410.40(e)(1).
2 42 CFR §410.40(e)(1).
three weeks. Repetitive ambulance services are often needed by beneficiaries receiving dialysis or cancer treatment.

Medicare may cover repetitive, scheduled non-emergent transportation by ambulance if

A. The medical necessity requirements described above are met, and
B. The ambulance supplier, before furnishing the service to the beneficiary, obtains a written order from the beneficiary’s attending physician certifying that the medical necessity requirements are met (see 42 CFR §410.40(e)(1) and (2)).

For more information on local coverage and documentation requirements, please refer to applicable Local Coverage Determinations and Articles found at the Medicare Coverage Database.

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3 Program Memorandum Intermediaries/Carriers, Transmittal AB-03-106.
4 Per 42 CFR §410.40(e)(2), the physician’s order must be dated no earlier than 60 days before the date the service is furnished.
3 - Model Overview

The model establishes a prior authorization process for repetitive, scheduled non-emergent ambulance transports to reduce utilization of services that do not comply with Medicare policy while maintaining or improving quality of care. Prior authorization does not create any new documentation requirements. It requires the same information that is already required to support Medicare payment.

Prior authorization is voluntary; however, if the ambulance supplier elects not to submit a prior authorization request before the fourth round trip in a 30-day period, the claim related to the repetitive, scheduled non-emergent ambulance transport will be subject to a prepayment medical record review.

3.1 - Model Inclusion

The model applies to independent ambulance suppliers that are not institutionally based providing Part B Medicare covered ambulance services billed on a CMS-1500 Form and/or a HIPAA compliant ANSI X12N 837P electronic transaction.

Ambulance suppliers under review by a Unified Program Integrity Contractor (UPIC) are not eligible to submit prior authorization requests.

Hospital-based ambulance providers owned and/or operated by a hospital, critical access hospital, skilled nursing facility, comprehensive outpatient rehabilitation facility, home health agency, or hospice program are not included and should not request prior authorization.

3.2 – Model Start Dates by State

- New Jersey, Pennsylvania, and South Carolina started on December 1, 2015 for transports occurring on or after December 15, 2014.
- Delaware, the District of Columbia, Maryland, North Carolina, Virginia, and West Virginia started on December 15, 2015 for transports occurring on or after January 1, 2016.
- The Centers for Medicare & Medicaid Services (CMS) continues to monitor the public health emergency and we will release more information on implementation dates to the remaining states and territories as it becomes available.

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5 Location is based on where the ambulance supplier is garaged.
4 - Healthcare Common Procedure Coding System (HCPCS) Codes

The following ambulance HCPCS codes are subject to prior authorization:

- A0426 - Ambulance service, Advanced Life Support (ALS), non-emergency transport, Level 1
- A0428 - Ambulance service, Basic Life Support (BLS), non-emergency transport

Prior authorization is not needed for the mileage code, A0425, as it is treated as an associated procedure. Ambulance suppliers are encouraged to bill the mileage code on the same claim as the transport code.

Medicare Administrative Contractors (MACs) will not review prior authorization requests for transport codes that are not on this list.
5 - Number of Trips

A provisional affirmative prior authorization decision affirms a specified number of trips within a specific amount of time. The prior authorization decision, justified by the beneficiary’s condition, may affirm up to 40 round trips (which equates to 80 one-way trips) per prior authorization request in a 60-day period.

Alternatively, a provisional affirmative prior authorization decision may affirm less than 40 round trips, or affirm a request that seeks to provide a specified number of transports (40 round trips or less) in less than a 60-day period. A provisional affirmative decision can be for all or part of the requested number of trips.

Transports exceeding 40 round trips (or 80 one-way trips) in a 60-day period require an additional prior authorization request.

5.1 - Special Consideration for Beneficiaries with a Chronic Medical Condition

The MAC may consider an extended affirmation period for beneficiaries with a chronic medical condition deemed not likely to improve over time. The medical records must clearly indicate that the medical condition is chronic, and the MAC must have established through two previous prior authorization requests that the beneficiary’s medical condition has not changed or has deteriorated from previous requests before allowing an extended affirmation period.

- The decision to allow an extended affirmation period is at MAC discretion. The maximum number of requested trips remains at 40 round trips (80 one-way trips).
- The prior authorization decision for requests meeting the above criteria may affirm up to 120 round trips (which equates to 240 one-way trips) per prior authorization request in a 180-day period.
- Ambulance suppliers are still responsible for maintaining a valid Physician Certification Statement (PCS) at all times. The MAC reserve the right to request the PCS at any time.
- Each individual patient transport must still be reasonable and necessary, regardless of whether a new prior authorization is required.
6 - Submitting a Request

The ambulance supplier or the beneficiary may submit the prior authorization request. Submitters are encouraged to use their respective MAC’s form specifically designed for prior authorization requests. The form assists submitters with ensuring requests are complete.

Submitters should include the following data elements in a prior authorization request package:

**Beneficiary Information**
- Beneficiary name,
- Beneficiary Medicare number, and
- Beneficiary date of birth

**Certifying Physician/Practitioner Information**
- Physician/practitioner name,
- Physician/practitioner National Provider Identifier (NPI),
- Physician/practitioner PTAN (optional), and
- Physician/practitioner address

**Ambulance Supplier Information**
- Ambulance supplier name
- Ambulance supplier National Provider Identifier (NPI)
- Ambulance supplier PTAN (optional), and
- Ambulance supplier address

**Requestor Information**
- Contact name and
- Telephone number

**Other Information**
- Number of transports requested,
- HCPCS code,
- Submission date,
- Requested start date of the prior authorization period,
- Indicate if the request is an initial or resubmission review,
- Indicate if the request is expedited and the reason why, and
- State where the ambulance is garaged

**Additional Required Documentation**
- Physician Certification Statement,
- Documentation from the medical record to support the medical necessity of the transports,
- Information on the origin and destination of the transports, and
- Any other relevant document as deemed necessary by the MAC to process the prior authorization.
6.1 - Submission Methods
Submitters may submit a prior authorization request to the appropriate MAC by either:
- Mail,
- Fax,
- Electronic submission of medical documentation (esMD), or
- MAC Provider Portal.

For esMD submissions, indicate document type “81” or “8.1”. For more information about esMD, see [www.cms.gov/esMD](http://www.cms.gov/esMD) or contact your MAC.

6.2 - MAC Contact Information

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6.2 – Prior Authorization Request Review
After receipt of all relevant documentation, the MAC will make every effort to review and postmark the notification of their decision to the ambulance supplier and the beneficiary within 10 business days for both initial and resubmitted requests.6

An ambulance supplier or beneficiary may request an expedited review when the standard timeframe for making a prior authorization decision could jeopardize the life or health of the beneficiary. If the MAC agrees that the standard review timeframe would put the beneficiary at risk, the MAC will make reasonable efforts to communicate a decision within 2 business days of

6 Based on stakeholder feedback, CMS decreased the review timeframe for resubmitted requests from 20 business days to 10 business days.
receipt of all applicable Medicare required documentation. As this model is for non-emergent services, CMS expects requests for expedited reviews to be extremely rare.

A prior authorization request can either be:

- Provisional affirmed (please see 7 - Provisional Affirmative Decisions) or
- Non-affirmed (please see 8 - Non-Affirmative Decisions).

See Appendix A - Prior Authorization Request Process for a visual representation of the prior authorization request process.
7 - Provisional Affirmative Decisions

A provisional affirmative decision is a preliminary finding that a future claim submitted to Medicare for the service likely meets Medicare’s coverage, coding, and payment requirements.

After review, the MAC will send the decision letter with the provisional affirmative unique tracking number to the submitter via fax, mail, or the MAC provider portal (when available) postmarked within 10 business days. Decision letters sent via esMD are not available at this time. The MAC will also mail a copy of the decision letter to the beneficiary.

A provisional affirmative prior authorization decision does not follow the beneficiary. Only one ambulance supplier is allowed to request prior authorization per beneficiary per time period. If the initial supplier cannot complete the total number of prior authorized transports, the initial supplier should contact their MAC to cancel their prior authorization. A subsequent ambulance supplier may submit a prior authorization request to provide transport for the same beneficiary and must include the required documentation in the submission.

7.1 – Ambulance Supplier’s Actions

Following receipt of an affirmative decision letter, the ambulance supplier should:

- Render the service to the beneficiary,
- Maintain all documentation, and
- Submit the claim with the unique tracking number, as described in 11 - Claim Submission with Prior Authorization.

Generally, claims that have a provisional affirmative prior authorization decision will not be subject to additional review. However, CMS contractors, including Unified Program Integrity Contractors and MACs, may conduct targeted pre and post-payment reviews to ensure that claims are accompanied by documentation not required during the prior authorization process. In addition, the Comprehensive Error Rate Testing contractor must review a random sample of claims for post-payment review for purposes of estimating the Medicare improper payment rate. If your claim is selected for review, the requesting contractor will provide guidance and directions in the Additional Documentation Request (ADR) letter.

See Appendix A - Prior Authorization Request Process for a visual representation of the prior authorization request process.
8 - Non-Affirmative Decisions

A non-affirmative decision is a preliminary finding that a future claim submitted to Medicare for the service does not meet Medicare’s coverage, coding, and payment requirements.

After review, the MAC will send the decision letter with the non-affirmative unique tracking number and details on why the prior authorization request was non-affirmed to the submitter via fax, mail, or the MAC provider portal (when available) postmarked within 10 business days. Decision letters sent via esMD are not available at this time. The MAC will also mail a copy of the decision letter to the beneficiary. Non-affirmative decisions are not appealable during the prior authorization process; however, resubmissions are unlimited.

8.1 - Ambulance Supplier's Action

Following receipt of a non-affirmative decision letter, the ambulance supplier has the following options:

- Resubmit another complete package with the additional documentation showing Medicare requirements have been met, as noted in the prior detailed decision letter(s). Resubmission are unlimited during the prior authorization process. Please see 9 - Resubmitting a Prior Authorization Request.
- Submit the claim for payment with the non-affirmative unique tracking number, as described in 11 - Claim Submission with Prior Authorization. The MAC will deny the claim. All appeal rights are then available.
  - If applicable, also submit the claim to a secondary insurance, as described in 10 - Secondary Insurance.

See Appendix A - Prior Authorization Request Process for a visual representation of the prior authorization request process.
9 - Resubmitting a Prior Authorization Request

A resubmission is any subsequent submissions to correct an error or omission identified after the initial prior authorization request decision was non-affirmed and prior to claim submission.

When a prior authorization request is non-affirmed, the submitter should review the detailed decision letter. The submitter may then resubmit the request with additional documentation showing that Medicare requirements have been met using the same submission procedures. Resubmissions are unlimited during the prior authorization process.

The MAC will provide notification of the decision through a detailed decision letter postmarked within 10 business days to the ambulance supplier and the beneficiary.7

See Appendix A - Prior Authorization Request Process for a visual representation of the prior authorization request process.

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7 Based on stakeholder feedback, CMS decreased the review timeframe for resubmitted requests from 20 business days to 10 business days.
10 - Secondary Insurance

This chapter pertains to instances where the beneficiary has more than one insurance.

10.1 - Medicare is the Primary Insurance
In cases where Medicare is the primary insurance and another insurance company is secondary, ambulance suppliers or beneficiaries may submit the claim without a prior authorization decision if the claim is non-covered (GY modifier). A prior authorization is not needed and the claim will not develop due to the prior authorization model. Services billed as not medically necessary (GA modifier) will be developed and reviewed under the prior authorization model.

Ambulance suppliers or beneficiaries choosing to use prior authorization should do the following:

- Submit the prior authorization request with complete documentation as appropriate.
  - If the prior authorization request is non-affirmed:
    - Submit the claim with the non-affirmed unique tracking number to the MAC for payment, which will deny.
    - Forward the denied claim to the secondary insurance payee as appropriate to determine payment for the transport.

10.2 - Medicare is the Secondary Insurance
In cases where Medicare is the secondary insurance, ambulance suppliers and beneficiaries have the following two options:

1. Seek Prior Authorization:
   - The submitter submits the prior authorization request with complete documentation as appropriate. The request will be affirmed if all relevant Medicare coverage requirements are met for the transport.
   - The ambulance supplier renders the service and submits a claim to the other insurance company.
   - If the other insurance company denies the claim, the supplier or beneficiary can submit a claim to the MAC (listing the prior authorization tracking number on the claim). The MAC will pay the claim.

2. Skip Prior Authorization:
   - The ambulance supplier renders the service and submits a claim to the primary payer for a determination as appropriate.
   - If the other insurance company denies the claim, the supplier or beneficiary can submit a claim to the MAC. The MAC will stop the claim for prepayment review and will send an ADR letter. The ambulance supplier should respond to the ADR.
11 - Claim Submission with Prior Authorization

11.1 – Affirmed Prior Authorization Decision
The submission of the prior authorized transport claim is to have the 14 byte unique tracking number that is located on the decision letter.

- For submission of a claim on a 1500 Claim Form, the unique tracking number is submitted in the first 14 positions in item 23. All other data submitted in item 23 must begin in position 15.
- For submission of electronic claims, the unique tracking number is submitted in either the 2300 - Claim Information loop or 2400 - Service Line loop in the Prior Authorization reference (REF) segment where REF01 = “G1” qualifier and REF02 = UTN.

11.2 – Non-Affirmed Prior Authorization Decision
The submission of the prior authorized transport claim is to have the 14 byte unique tracking number that is located on the decision letter.

- For submission of a claim on a 1500 Claim Form, the unique tracking number is submitted in the first 14 positions in item 23. All other data submitted in item 23 must begin in position 15.
- For submission of electronic claims, the unique tracking number is submitted in either the 2300 - Claim Information loop or 2400 - Service Line loop in the Prior Authorization reference (REF) segment where REF01 = “G1” qualifier and REF02 = UTN.

A claim submitted for payment with a non-affirmative prior authorization decision will deny. All appeal rights are then available. The claim could also be submitted to a secondary insurance, if applicable, as described in 10 - Secondary Insurance.

11.3 – Mileage Code Billing
The unique tracking number assigned to the transport code should not be included on the mileage code. Ambulance suppliers are encouraged to bill the mileage code on the same claim as the transport code.

See Appendix B - Claim Line Process with Prior Authorization for a visual representation of the claim line process.
12 - Claim Submission without Prior Authorization

The MAC will stop an applicable claim for prepayment review if submitted without a prior authorization request decision.

Ambulance suppliers do not need to do anything differently when submitting a claim without a unique tracking number. They do not need to put any information in the remarks field or submit any unsolicited documentation at the time of claim submission.

12.1 - The Prepayment Review Process

Prepayment review means that the MAC will make a claim determination before claim payment, using the standard Medicare prepayment review process8:

- The MAC will stop the claim prior to payment and send the ambulance supplier an ADR letter through the US Postal Service.
- The ambulance supplier will have 45 days to respond to the ADR with all requested documentation via:
  - Fax,
  - Mail, or
  - esMD (for more information see: www.cms.gov/esMD).
- The MAC will have 30 days to review the documentation and render a claim determination.

See Appendix C - Claim Line Process without Prior Authorization for a visual representation of the claim line process.

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8 For additional information on the standard Medicare prepayment review process, please see the CMS Internet-Only Manual, Pub 100-08, Medicare Program Integrity Manual, Chapter 3, §3.2.
13 - Claim Appeals

Appeals follow all current procedures. For further information, consult the Medicare Claims Processing Manual publication 100-04, chapter 29 Appeals of Claims Decision.

The prior authorization model does not include a separate appeal process for a non-affirmative prior authorization decision. However, a non-affirmative prior authorization decision does not prevent the ambulance supplier from submitting a claim. Such a submission of a claim and resulting denial by the MAC would constitute an initial determination that would make the appeals process available for disputes by beneficiaries and ambulance suppliers.
Appendix A - Prior Authorization Request Process

Prior Authorization Request Process
Repetitive, Scheduled Non-Emergent Ambulance Transport

Beneficiary
- Visits physician/practitioner

Ordering Physician/Practitioner
- Documents in the medical record the medical necessity of the transport.
- Writes, signs, and dates the Physician Certification Statement

Ambulance Supplier
- Submits prior authorization request package including:
  - Physician certification statement
  - Information on origin and destination
  - Documentation from medical record to support the medical necessity of the transport
  - Other supporting documentation

A/B MAC
- Receives/reviews package
- Makes PA decision
- Sends notification
  - Initial and resubmitted requests: 10 days

Beneficiary may submit prior authorization request package
CMS expects this option to be seldom used and recommends that the beneficiary work with the supplier.

Notice of decision*

If non-affirmative decision, can resubmit request

Notice of decision*

* If the decision is non-affirmative, the notification will contain detailed reasoning.
Appendix B - Claim Line Process with Prior Authorization

Ambulance Claim Line Process
(if PA was requested)

- **Submits Claim**
  - Receives claim where PA was affirmed → Pay Claim*
  - Receives claim where PA was NOT affirmed → Deny Claim**

* If all Medicare coding, billing, and coverage requirements are met.
** Appeal rights are available to the ambulance supplier and the beneficiary.
Appendix C - Claim Line Process without Prior Authorization

Ambulance Claim Line Process
(if PA was not requested)

Ambulance Supplier
- Submits claim
- Receives ADR letter
- Stops claim for prepayment review and sends ambulance supplier ADR letter
- Receives claim where PA was NOT requested

A/B MAC
- Submits documentation:
  - Physician certification statement
  - Tnp record
  - Documentation from medical record to support the medical necessity of transport
  - Other supporting documentation
- Receives and reviews documentation
- Makes claim determination
- Sends notice to ambulance supplier

30 days

Pay claim
Yes
No
Deny claim

Is Claim Payable?

Pay claim

* Appeal rights are available to the ambulance supplier and the beneficiary.