

The Use of Public Transportation Services for Ridesharing Expenses

ODP Announcement 22-044

AUDIENCE:

Individuals and families, common law employers (CLE), managing employers, providers enrolled directly or as an Organized Health Care Delivery System (OHCDS) to provide Transportation services in the Consolidated, Community Living, Person/Family Directed Support (P/FDS), and Adult Autism Waivers or base-funded services, Administrative Entities (AEs), Supports Coordination Organizations (SCOs), Vendor Fiscal/ Employer Agent (VF/EA) Financial Management Services (FMS) organizations, and Agency With Choice (AWC) organizations

PURPOSE:

To clarify that ridesharing services, such as Lyft, Uber, or other similar transportation services, may be reimbursed through the public transportation service.

DISCUSSION:

Public transportation services are provided to or purchased for an individual to promote self-determination and enable an individual to gain access to employment, services, and activities specified in the Individual Support Plan (ISP). Public transportation may be purchased by an OHCDS or by an FMS organization for individuals who self-direct services. In addition, public transportation vendors may enroll directly with the Office of Developmental Programs (ODP).

For individuals receiving residential services (Residential Habilitation, Life Sharing or Supported Living), transportation services may only be used to enable an individual to get to his or her competitive, integrated job. If the individual is using public transportation for other needs such as community activities, volunteering, visiting family or friends, etc.; the cost of this service is included in the rate paid to providers of Residential Habilitation, Life Sharing and Supported Living.

Determining if Ridesharing is Appropriate

The cost of ridesharing services, such as Uber, Lyft, or similar public transportation options, can be reimbursed through the Transportation service. If the Transportation service is under consideration by the individual and their ISP team, the team must determine if using a ridesharing service is a cost-effective, beneficial, and practical transportation option for the individual. The team must consider other options available through the Transportation service including publicly available bus passes, rail service, taxi service., and Transportation Trip to ensure the most cost-effective, beneficial, and practical use of the service.

When adding public transportation to an individual's ISP, the team should determine and document actual expected use rather than requesting a sum to be used "as needed." The team must select the most cost-effective and appropriate modes of transportation for the individual. In the Adult Autism Waiver (AAW), which has a \$4,500 per-plan-year limit¹ on the Transportation service, the team must assist the participant in budgeting appropriately to ensure the participant has adequate funds throughout the year for necessary travel.

¹ The annual plan-year fiscal limit on transportation in the Adult Autism Waiver is subject to change. SCs should check the current approved waiver for the annual plan-year fiscal limit.

Considerations When Making Payments to Ridesharing Companies

- Federal Medicaid law prohibits individuals or their representatives from receiving Medicaid funds directly and therefore individuals and their families cannot receive reimbursement for payment for ridesharing services. This includes when the managing employer or CLE pays for public transportation using personal funds.
- The directly enrolled provider, AWC, VF/EA, or OHCDSS organization needs to verify the types of payment options the ridesharing service will accept. For example: a gift card, credit card, or the establishment of an account may be a viable option to pay for these services.
- Waiver funds can only be used for the direct provision of transportation. Waiver funds cannot be used to pay administrative fees for ridesharing services.
- Waiver funds cannot be used for tips or other services (such as food delivery by a ridesharing service).
- The cost for ridesharing services may fluctuate and often is impacted by weather, public events, or the day or time that the service is needed (such as when an individual uses public transportation on a holiday).

Authorization, Billing, and Receipts:

1. **Matching authorization and utilization as closely as possible is strongly recommended.**

For example, Lisa, who receives services through the Consolidated Waiver, works at a fast-food restaurant which is five miles from her group home. She works three

shifts a week, one of them on weekends. She can take the bus to work, but her weekend shifts end after the bus route has completed its weekend schedule.

Transportation to and from competitive integrated employment is provided through the Transportation service, therefore, the team requests \$60 for a monthly bus pass and \$125 for Uber gift cards per month. The team decided on \$125 by checking the [Uber fare calculator](#) on the Uber website. The fare calculator estimated that an average ride would cost between \$15-20 each, and the team built in an extra amount for any surge costs per ride due to demand, weather, etc. The Supports Coordinator should check Lisa's utilization to ensure she will not run out of funds for Uber rides, as well as to ensure she is using the service as planned.

The SC authorized 125 units at \$1 per unit to get the Uber gift cards on Lisa's plan. It is suggested to use this formula (one unit equals \$1) for ride-share gift-card purchases on individual plans.

For the bus pass, the provider bills PROMISE for the amount spent. For the Uber rides, the provider obtains Lisa's receipt log from her Uber app and bills PROMISE for only the rides that have been provided, after they have been used, rather than for the total amount of the gift card.

2. Establishing a business account may streamline billing.

For example, Countywide Financial Management Services provides ridesharing services as the FMS to 20 individuals who utilize the participant-directed services option in the Consolidated, Community Living or P/FDS waivers. Countywide opened a business account with Uber and listed the 20 participants on their business account.

Countywide collects their ride receipts from its business account and bills PROMISE for the utilized rideshare services and OHCDs administrative fees on a monthly basis.

3. **Obtaining rideshare receipts is essential.**

The provider, AWC, VF/EA, or OHCDs organization needs to obtain a receipt from the ride sharing service or individual to verify that the individual received the service. After a receipt is obtained, the organization must maintain documentation in accordance with ODP policy and regulation, and the claim for public transportation may be submitted.

Receipts are typically received through the email address that was used to set up the account with the ridesharing service, can be received through the ridesharing service application that is used on a technology device, or other methods. For additional information on the ridesharing service, please refer to the website of the specific ridesharing service being explored.

For example, A-Z Supports Coordination Organization is registered as an OHCDs in the AAW. A-Z provides Lyft gift cards for 10 AAW participants, buying \$1,500 on a monthly average. To ensure consistent cash flow, A-Z has instructed Supports Coordinators to make sure that the 10 participants forward their ride receipts, which are available through the Lyft app or by email, on a biweekly basis. A-Z then submits bills and OHCDs administrative fees once it has collected the ride receipts.

Tahj lives in a private apartment he rents and receives Transportation services through his AAW waiver. A-Z Supports Coordination buys him \$150 in Lyft gift cards each month to provide rides to visit his friends and to go food shopping. Tahj used four rides in the first two weeks of March - \$18.50, \$19.50, \$21.20 and \$23.30, for a total of \$82.50. Tahj downloads his ride report, which Lyft sends him via email, and forwards that email to his Supports Coordinator. The Supports Coordinator then

sends that email to A-Z Supports Coordination. The Supports Coordinator also points out to Tahj that he has \$67.50 left of the original \$150 Lyft gift card for March.

The OHCDs, upon receiving the receipts for the \$82.50 used, bills PROMISE for \$82.50 and for the \$8.25 OHCDs administrative fee. Tahj can use the remaining \$67.50 for rides in the future (in the same plan year), and the OHCDs can bill once it receives the receipts for those rides.

COMMENT:

Please contact the appropriate ODP regional office with any questions about this communication.