

Free Transportation Policy

1. Purpose

_____ (“Provider”) understands patients may not be able to access health care services either consistently or from time to time due to lack of transportation and that many patients who lack transportation are elderly and/or disabled individuals or individuals who cannot afford available transportation options. In furtherance of its mission and as a benefit to its community, Provider desires to assist these patients with transportation, as allowed by applicable law, to ensure patients do not delay or forgo necessary healthcare services due to lack of transportation. The intent of this Policy is to outline when and how free transportation may be offered and provided to patients to ensure compliance with applicable laws.

2. Definitions

“Allowable Geographic Transport Area” is within 25 miles of the applicable Provider location the patient requires transportation to and/or from, except for Provider locations located in a “rural” area in which case the Allowable Geographic Transport Area is within 75 miles. Those Provider locations located in a rural are listed on Schedule A.

“Established patient” means a patient who has selected and initiated contact with Provider as evidenced by scheduling an appointment or having previously attended an appointment with Provider.

“Provider Transport Vehicle” is a vehicle maintained by Provider and utilized by Provider to provide transportation to established patients. “Provider Transport Vehicle” does not include Provider’s owned/operated ambulance service unless with rare exception the Provider Transport Vehicle and other Transportation Services are unavailable, the only available transportation option is the Provider’s ambulance, the Provider’s ambulance is available for the transport, and the patient does not require ambulance-level services. Patients whose condition requires some level of medical transport, including but not limited to ambulance services, will be billed for such services consistent with the Provider’s policies.

“Transportation Service” means third-party transportation services, such as Uber, Lyft, taxi, or other service providing local transportation services within Provider’s service area, including any transportation service contracted by Provider to provide complimentary transportation services to its established patients. The list of current Transportation Service options available to assist patients is listed on Schedule A, attached hereto and incorporated herein by reference and may be updated from time to time by Provider to reflect the then current service offerings in its service area.

This material is intended for educational and informational purposes only. This document is not intended to be legal advice and is only a high level summary. Legal advice must be tailored to the specific circumstances and users are responsible for obtaining such advice from their counsel.

3. Policy

Provider offers free transportation within the Allowable Geographic Transport Area to established patients identified by Provider as either needing transportation to access a needed healthcare service or needing transportation after having received a service from Provider. Free transportation is typically provided through a Provider Transport Vehicle. During dates and times a Provider Transport Vehicle is unavailable, transportation may be arranged by Provider through a Transportation Service. Free transportation is not intended for patients who require some level of medical transport, including but not limited to ambulance services, which are provided and billed by Provider in accordance with its policies and applicable third party payer agreements and policies.

4. Procedures

a. Identifying Established Patients Requiring Transportation

i. Provider's personnel identifies established patients requiring transportation assistance at the time of scheduling, through inquiries with patients at appointments, during follow-up calls and/or when inquiring about missed or cancelled appointments. Patients with the ability to pay for transportation without hardship may be referred to a Transportation Service, if available, for assistance

ii. When a staff member identifies an established patient needing transportation assistance for a medically necessary healthcare service or receives an inquiry from an established patient about transportation assistance and determines that payment for transportation would be a hardship for the patient or there is no available Transportation Service, the staff member will make a transportation referral to _____, identifying the name and contact information for the patient, the service he/she needs transportation for, and whether such service has been scheduled or whether transportation needs to be coordinated with scheduling.

b. Approval and Coordination of Transportation

i. Upon receipt of a referral for scheduled free transportation, _____ will be responsible for contacting the patient and/or his/her representative to discuss potential transportation options, reviewing the circumstances to ensure the transportation is within the Allowable Geographic Transport Area and free transportation is appropriate for the patient, and coordinating the scheduling of transportation to coincide with the service, if free transportation is approved and appropriate. Patients requiring medical transport are generally not eligible for free transportation services and transportation is instead coordinated and billed for in accordance with the Provider's policies and the policies of the applicable third party payer.

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ii. Free transportation will typically be provided through the Provider Transport Vehicle; however, if free transportation is required during dates/times the Provider Transport Vehicle is unavailable and a service cannot be scheduled when it is available, a Transportation Service, if available, may be contacted and arranged for the patient with the cost to be paid for by Provider if it is determined that payment would be a hardship to the patient.

c. **Unscheduled Transportation Needs.** In the event a patient on-site at Provider and receiving services, such as an emergency room patient or discharged inpatient, identifies he/she has no transportation home, Provider personnel should contact _____. If the patient is being discharged from an inpatient stay or an observation stay exceeding 24 hours, there will be no restriction to the Allowable Geographic Transport Area. If the patient is not being discharged from an inpatient stay or an observation stay exceeding 24 hours, _____ will first determine whether the patient's destination is within the Allowable Geographic Transport Area. If the patient qualifies for free transportation, _____ will arrange for the Provider Transport Vehicle to transport him/her home. If the Provider Transport Vehicle is unavailable, _____ will coordinate another Transportation Service option. If no other Transportation Service option is available and patient has no other means home, the ambulance may be used as a last resort provided it is available and the patient does not require medical transport. If the patient requires transportation outside the Allowable Geographic Transport Area and is not being discharged from an inpatient stay or observation stay exceeding 24 hours, _____ will work with the patient to explore paid transportation services and/or any other source of available transportation options.

d. **Uniform/Consistent Application of the Policy.** This Policy will be uniformly and consistently applied and the decision to offer free transportation shall not be based on factors such as the patient's race, ethnicity, gender, age, sexual orientation, gender identity, religion or other protected class. Only the criteria identified herein should be utilized to determine whether free transportation is allowable and appropriate in accordance with this Policy and applicable law.

e. **Prohibited Conduct/Compliance with Applicable Laws.** To ensure compliance with applicable laws, the Provider:

i. Will not advertise free transportation services or market them in any way. The availability of free transportation is only mentioned after a staff member determines an established patient has a potential need for transportation services and has reason to believe payment would be a potential hardship for the patient;

ii. Limits free transportation only to established patients and only for necessary healthcare services;

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iii. Will not provide air transportation or luxury transportation. Ambulance transports are considered luxury unless otherwise provided in this policy in rare circumstances when the patient does not require medical transport and the ambulance is available and the only means of transportation;

iii. Applies this Policy consistently and uniformly without regard to the volume or value of the services involved, the patient's insurer or third party payer, or anticipated revenue; and

iv. Will be responsible for the cost of providing free transportation services and will not transfer this cost to any government health care program.

f. Oversight. Questions and concerns regarding this Policy or the provision of free transportation services should be directed to _____ at _____
