

**Medical Assistance Transportation Program
Operations Memorandum
General Operations
MATP OPS Memo # 07/2024-001**

Date: July 31, 2024

Subject: MATP Application Addendum - HIPAA Authorization

To: All County Administrators, Contracted Transit Agencies, and Brokers of the Medical Assistance Transportation Program (MATP)

From: Gwendolyn Zander, Director, Bureau of Managed Care Operations

Purpose:

The purpose of this memorandum is to inform County Administrators, Contracted Transit Agencies, and Brokers who administer the Medical Assistance Transportation Program (MATP) (collectively referred to as "MATP Administrators" or "Administrators") of a standardized process when performing activities involving the consent for release of consumer protected health information for trip verification purposes in a manner compliant with the federal Health Insurance Portability and Accountability Act of 1996 (HIPAA).

Background:

To detect and prevent fraud, waste, and abuse, the MATP Standards and Guidelines (S & G) requires that the MATP Administrator develops policies and procedures to verify information on applications, vouchers, manifests, and any appropriate documentation for the expressed purpose of avoiding fraud and abuse. Additionally, the Administrator must have payment procedures verifying that transportation provider claims for reimbursement match verification of authorized trips. The S & G further requires that the Administrator has a process in place to verify that consumers will attend or have attended scheduled medical appointments or other MA-covered services by verifying 5% of all trips annually (3% pre-trip and 2% post-trip).

Currently, MATP Administrators require consumers to complete and sign an application and release of information form which provides that the MATP Administrators may verify requested trips to medical services.

Discussion:

To further ensure adherence to Chapter 26 of the S & G, Maintain Confidentiality of Information, 55 Pa. Code, Section 2070.25, 45 C.F.R. Parts 160 & 164, and 42 C.F.R. §§ 431.300-431.307 as well as make it easier for Administrators to verify MATP trips with medical providers through the use of a HIPAA compliant release form, the Department of Human Services (DHS) has developed a Commonwealth-wide standardized HIPAA compliant form for consumers to sign and authorize HIPAA-covered medical providers to release protected health information to Administrators to verify medical appointments. The form is attached to this Operations Memorandum and must be an addendum to all MATP consumer applications as described below. If a consumer fails to or declines to submit a completed form to authorize a medical provider to release protected health information to an Administrator, the Administrator must note this on the application and in the consumer's file and may not solicit any protected health information, as defined by HIPAA, from a medical provider for verification purposes.

A Commonwealth-wide standardized MATP consumer application will be developed and issued in a separate Operations Memorandum.

Next Steps:

Effective immediately, a HIPAA compliant release form to authorize HIPAA-covered medical providers to release protected health information must accompany all applications, signed by all **new and current** consumers, and then stored in their file. The MATP Administrator must specify the name and contact information of the MATP Administrator in Section III of the form prior to use. All other fields of the form are to be completed by the consumer.

New consumers, who are those individuals applying for MATP services on or after the effective date of this memorandum, should complete and sign the Administrator's existing application with the current version of the HIPAA release addendum.

Current consumers, who are those individuals who have completed the MATP Administrator's existing application, must be provided with the HIPAA compliant release addendum prior to or at the time of scheduling their next trip.

If a consumer declines to sign the addendum or withholds authorization to release any of the types of protected health information referenced within the form, the MATP Administrator may not refuse transportation services to that consumer.

Attachment:



HIPAA-Authorization-Attachment-to-M/