

August 16, 2019

Reminder – Hospitals Must Use New PCS Form for Non-Emergency Ambulance Transfers under Medicaid

Hospitals are urged to review their policies and procedures to assure that they are complying with the updated Physician Certification Statement (PCS) form that a hospital must complete and provide to an ambulance provider, prior to transport of a non-emergency patient, as part of each hospital's discharge planning process.

The Illinois Department of Healthcare and Family Services (HFS) has advised IHA that there have been systemic challenges with hospitals properly completing the new PCS. A hospital's failure to comply with completing the PCS could lead to financial penalties from HFS. While IHA investigates whether HFS currently has authority to impose fines on hospitals for providing an incomplete PCS, widespread compliance issues will likely result in action by HFS.

Moreover, PCS non-compliance will lead to renewed calls from the ambulance industry for legislation requiring a hospital to pay for the transport if it fails to properly complete the PCS. In 2018, IHA was able to avoid such a legislative requirement by advocacy efforts requesting that hospitals have time to implement the revised PCS requirement before imposing a financial penalty.

The PCS is an important document for ambulance providers, particularly when transporting Medicaid patients. Many Medicaid managed care organizations and HFS will deny the ambulance provider's claim without a completed PCS. HFS is reporting high denial rates specifically with First Transit, which is the provider for those patients still using fee-for-service Medicaid.

The new form developed by HFS, with input from IHA, pursuant to <u>Public Act 100-0646</u>, can be accessed <u>here</u>. (NOTE: The preferred browser for accessing the form is Internet Explorer. If using other browsers, please see IHA's <u>resource</u> for instructions.)

Detailed information about new requirements for hospitals can be found in an August 2018 IHA <u>memo</u>. A recording of an IHA and HFS webinar on the new PCS can be accessed on the IHA Education <u>page</u>.

Hospitals may also reach out to HFS directly by contacting Christina McCutchan, Manager of Transportation and Dental, at <u>Christina.McCutchan@illinois.gov</u>. She has offered to provide additional assistance and training on the new PCS to hospitals.

If you have questions or information related to barriers to properly completing the PCS, please contact IHA.

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