



**COLORADO**  
Department of Health Care  
Policy & Financing

1570 Grant Street  
Denver, CO 80203

# Medicaid Client Transport Permit Frequently Asked Questions

*FAQ October 2020*

This is a resource for Providers to find answers to frequently asked questions regarding the requirements of the Medicaid Client Transport (MCT) Permit for providers of Non-Medical (NMT) services, per [Informational Memo HCPF IM 20-048](#). As a reminder, the Department of Health Care Policy & Financing (Department) is not full compliance until 7/1/2021. Additionally, the Department commits to working with providers in ongoing stakeholder dialogs to understand any additional concerns.

## Frequently Asked Questions

### **What is an MCT permit?**

A “Medicaid Client Transport” permit is a transportation permit that is required for all providers that use a Motor Vehicle to transport Passengers who are recipients of Medicaid pursuant to Articles 4 to 6 of Title 25.5, C.R.S. and are being transported under Medicaid Non-emergent Medical Transportation (NEMT) and NMT services.

The MCT permit is intended to ensure the health and safety of the State’s most vulnerable members. The Public Utilities Commission (PUC) provides oversight of these services and require that every motor vehicle providing NMT services come into full compliance by obtaining an MCT permit.

### **Who is required to obtain an MCT permit?**

All Medicaid enrolled NMT providers and Program Approved Service Agencies (PASA) that render and bill for NMT services must obtain an MCT permit.

### **Do providers who transport members as part of another waiver service need an MCT permit?**

An MCT permit would only be required if they are rendering and billing for NMT services. This does not apply to a direct service provider transporting a member as part of the

residential habilitation service.

**How do I apply for an MCT permit and what is required to complete an application?**

To apply for the MCT permit, complete the [online application](#) through the PUC. Provider agencies must submit information on both the drivers and vehicle being used to provide NMT services. The table below outlines application requirements and the associated costs.

**NMT – MCT Permit Requirements Table for FAQ**

| <b>Program Approved Service Agencies (PASAs)</b> |                   |  |
|--|-------------------|--|
| <b>Requirement</b>                               | <b>Cost Range</b> | <b>Comments</b>  |
| MCT permit application                           | No cost           | <a href="https://doraapps.state.co.us/puc/TransportationApplications/">https://doraapps.state.co.us/puc/TransportationApplications/</a>  |
| Motor Vehicle Liability Insurance                | Varies            | Minimum Liability Limits/Seating Capacity:<br>\$500,000 minimum/8 or fewer passengers<br>\$1,500,000/9-15 passengers<br>\$3,000,000/16-32 passengers<br>\$5,000,000/33 or more passengers<br><br>Suggested:<br>Non-Owned Auto Coverage<br>Extends liability coverage to employees who are utilizing their personal vehicles while operating on behalf of the business. |
| Vehicle Identification Record                    | No cost           | Make, Model, Year, and VIN of all vehicles in service  |
| Driver’s Application for Employment              | No cost           | This must be completed by the MCT permit applicant, even if they do not personally intend to transport clients.<br><br>Provided in the Carrier Information Packet  |

| <b>Driver</b>                            |                   |   |
|--|-------------------|---|
| <b>Requirement</b>                       | <b>Cost Range</b> | <b>Comments</b>   |
| Driver’s Application for Employment      | No cost           | Provided in the Carrier Information Packet  |
| Fingerprint-based criminal history check | \$40 - 50         | CBI-approved vendors: PUC, <a href="#">IdentoGO</a> , <a href="#">Colorado Fingerprinting</a> , <a href="#">Colorado Correctional Industries (CCI)</a>                    |
| Medical Examiner’s Certificate/Driver    | Varies            | Certification of medical fitness to operate a motor carrier requires an examination performed by an osteopath, physician assistant, nurse practitioner, or clinical nurse |

|                            |  |   |
|----------------------------|--|---|
| Medical Certification Card |  | specialist working under the direct supervision of a physician. Certification is valid for a term of 2 (two) years, unless otherwise specified. |
|----------------------------|--|---|

| Vehicle                               |            |  |
|---------------------------------------|------------|--|
| Requirement                           | Cost Range | Comments   |
| Vehicle inspection Report - Passenger | \$75 - 100 | A.S.E. (Automotive Service Excellence) certified, multiple locations - PUC-approved form provided in the Carrier Packet                                      |
| Motor Vehicle Identification stamp    | \$50       | Fee is per vehicle, per calendar year. All vehicles are required to obtain a new stamp January 1 <sup>st</sup> , regardless of when previous stamp obtained. |
| 100 Air Mile Log                      | No cost    | Driver log certifying number of hours on duty/hours driven - Provided in the Carrier Packet  |
| Preventive Maintenance Plan           | No cost    | Maintenance log for all vehicles in service - Provided in the Carrier Packet   |

**My provider agency already conducts background checks on my employees and subcontractors; do I still need to submit the fingerprint background check for each driver?**

Yes. Most agencies only complete a name-based background check. The background check required for the MCT permit researches the individual based on their fingerprint instead of their name only. Additionally, the PUC checks the fingerprints against both the Colorado Bureau of Investigation and the Federal Bureau of Investigation (FBI). A provider agency may substitute the background check used for the MCT permit for other purposes or requirements.

**I heard that it could take three months to hear back on the results of a background check. Do I have to wait for the results before my driver can transport members?**

No. If the fingerprints have been submitted for review, and you have a receipt for submission of the fingerprints, your driver can transport members without issue.

**Do the MCT permit requirements apply to provider agency employees and subcontractors who utilize their personal vehicles?**

Yes, any employee or subcontractor of a provider agency that uses their personal vehicle for reimbursable NMT services must submit to the fingerprint-based background check as well as obtain a Motor Vehicle Identification stamp for any vehicle they use to transport members.

**Do family caregivers and host home providers have to comply with the MCT permit requirements?**

Family caregivers and host home providers who *reside with the member do not* have to submit fingerprint-based background checks nor obtain Motor Vehicle Identification stamps for their vehicles.

**Do each of my drivers have to complete the requirement of a Medical Examination?**

Yes. The PUC and the US Department of Transportation (USDOT) require a medical examination be completed for each driver. By verifying a driver's fitness to drive, it helps to ensure the safety of the passengers.

**When do providers have to comply with these requirements?**

If you are a new Medicaid NMT provider, you must obtain an MCT permit as part of the enrollment process. If you are an existing enrolled provider, you must obtain an MCT permit and meet all requirements no later than 6/30/2021.