



Coordinating Council on Access and Mobility Cost-Sharing Policy Statement

July 2020

Introduction

The Coordinating Council on Access and Mobility (CCAM) was established in 2004 by Executive Order 13330 in order to improve the accessibility, availability, and efficiency of transportation services for people with disabilities, older adults, and individuals of low income. The Secretary of Transportation chairs the CCAM and the CCAM's membership consists of the secretaries of Agriculture (USDA), Education (ED), Health and Human Services (HHS), Housing and Urban Development (HUD), the Interior (DOI), Labor (DOL), Transportation (DOT), and Veterans Affairs (VA), as well as the Attorney General (DOJ), the Chairperson of the National Council on Disability (NCD), and the Commissioner of the Social Security Administration (SSA).

The Executive Order directs CCAM members to work together to provide the most appropriate, cost-effective transportation services within existing resources, and reduce duplication to make funds available for more services. Fully coordinating transportation through vehicle and ride sharing for Medicaid, aging, and other human service transportation trips can result in a 10 percent increase in passengers per revenue hour, which can create significant cost savings for Federal, State, and local agencies.¹

This CCAM Cost-Sharing Policy Statement provides key transportation cost-sharing information to encourage greater State and local cost sharing. This includes principles specific to the provision of Medicaid nonemergency medical transportation (NEMT) and the Veterans Health Administration's (VHA) Highly Rural Transportation Grants (HRTG) program, which provides NEMT for Veterans living in highly rural areas.

Policy Statement

CCAM agencies agree that Federal grantees should coordinate their transportation resources where possible, including sharing costs for mutually beneficial transportation services, in order to maximize the availability and efficiency of transportation services.

Cost-sharing arrangements include both **vehicle and ride sharing** as well as **Federal fund braiding for local match** across Federal programs, which are discussed in more detail below.

Vehicle and Ride Sharing

Vehicle and ride sharing occur when a single shared vehicle transports beneficiaries of multiple Federal programs. Vehicle sharing may occur with shared rides, when multiple Federal programs' beneficiaries are on the same vehicle simultaneously, or with individual rides, when a vehicle transports a single beneficiary at a time. Participating partners pay for the equitable proportion of shared costs for transporting its beneficiaries.

Before local partners begin to share vehicles and rides, they should first establish a local cost-allocation agreement that details how partner organizations will allocate shared costs. To establish this agreement, local partners may wish to consult the Federal Transit Administration's Cost Allocation Handbook, which provides high-level guidance on determining and allocating shared costs. Local partners should incorporate the general and program-specific principles below, as applicable. Local partners should also consult and adhere to any Federal, State, or local laws and regulations related to vehicle and ride sharing and cost allocation.

¹ "Uncover the Impacts of Coordinating Human Services Transportation—One Study, Two Locations, and Three What-If Coordination Scenarios." Charlotte Burnier, et al. Presented at 93rd Annual Meeting of the Transportation Research Board. 2014.



General Principles: These principles apply to any transportation cost-allocation agreement.

- 1. Costs must be allocated based on the benefit received by each local partner and may not be allocated based on how much funding individual partners have available.
- 2. Each local partner must pay the amount equal to its allocable share of the costs.
- 3. No local partner may pay for a cost that does not benefit its program as determined in the cost-allocation process.
- 4. No program may pay for a cost that is unallowable under its governing statutes and regulations.
- 5. The local cost-allocation agreement must be updated regularly (e.g., annually) to account for changes in expenses or frequency of use.
- 6. If shared activities result in program income, then the program income should be allocated to partners in the same proportion as shared costs.
- 7. Local cost-allocation agreements should include how rates address the cost of a required attendant for a passenger.

Medicaid Principles: These principles apply to any transportation cost-allocation agreement that includes a local partner using Medicaid funds on transportation.

- 8. Medicaid will only pay for transportation to and from covered medical care.
- 9. Medicaid is the payer of last resort, and will only pay for transportation if there are no other legally liable third payers. There are some exceptions to this rule.²
- 10. Medicaid will not pay directly for unloaded miles (miles driven when the Medicaid beneficiary is not in the vehicle) or for missed trips. However, Medicaid may pay indirectly for these costs and other indirect costs, such as vehicle depreciation, when they are built into the rate methodology for completed trips.
- 11. Medicaid will not pay any additional costs that arise from sharing rides with local partners' beneficiaries, such as costs associated with longer trip times.

HRTG Principles: These principles apply to any transportation cost-allocation agreement that includes a local partner using HRTG funds.

- 12. HRTG will pay for the transport of Veterans who live in highly rural areas (county or counties with less than seven persons per square mile) to and from VA medical facilities or VA-authorized medical facilities.
- 13. Before participating in vehicle or ride sharing with local partners, HRTG grantees should consult the VHA.
- 14. Vehicles purchased with HRTG funds may be used for vehicle and ride sharing to transport local partners' beneficiaries within or outside highly rural areas. Costs to transport local partners' beneficiaries must be allocated to those local partners.
- 15. The VHA encourages HRTG grantees to avoid potential public misperception that passengers who are not highly rural Veterans are being served by HRTG funds. To support this goal, HRTG grantees using HRTG-branded and Veteran-branded vehicles to transport local partners' beneficiaries may consider covering HRTG-specific and Veteran-specific vehicle markings or using unbranded vehicles when serving local partners' beneficiaries.

Federal Fund Braiding for Local Match

Federal fund braiding for local match, also referred to as Federal fund braiding, is when Federal funds from one grant program are used to fulfil the local match requirement of another Federal grant. This provides Federal grantees the opportunity to share costs of a transportation project across multiple Federal programs. All statutory and regulatory requirements, such as eligibility and reporting, must be met for both programs.

² For exceptions to Medicaid's payer of last resort rule, see page 20 of the "Coordination of Benefits and Third Party Liability (COB/TPL) In Medicaid" handbook (<https://www.medicaid.gov/sites/default/files/2019-12/training-and-handbook.pdf>). In addition to the programs listed in the handbook, the World Trade Center Health Program and the Title IV-E Prevention Services program are also exceptions to Medicaid's payer of last resort rule.



Federal fund braiding arrangements can especially benefit communities that are otherwise unable to provide match funds for Federal transportation projects. Federal fund braiding also encourages greater coordination at the local level due to the additional reporting requirements that grantees must meet when receiving funds from two Federal sources.

Federal fund braiding is not available between all Federal programs that may fund transportation. To determine if Federal fund braiding is a possibility, potential grantees should consult the CCAM's Federal Fund Braiding Guide. The Federal Fund Braiding Guide discusses whether Federal fund braiding is allowable for 67 Federal programs that may fund transportation and provides additional information on grantee eligibility requirements.

Potential grantees looking to find State or local partners to coordinate and braid funds with may also consult the CCAM Program Inventory, which identifies 130 Federal programs that may provide funding for human service transportation. Grantees of these Federal programs may be potential future partners for transportation projects funded via Federal fund braiding.

List of Resources

1. **“Appendix A: Cost Allocation Handbook.” Federal Transit Administration. 2016.**
https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/ntd/56681/uniform-system-accounts-usoa-effective-fy18_0.pdf

The Federal Transit Administration’s Cost Allocation Handbook provides high-level guidance for Federal grantees to assign costs when participating in vehicle and ride sharing. The Cost Allocation Handbook begins on page A-1 of this document.

2. **“CCAM Program Inventory.” Coordinating Council on Access and Mobility. 2019.**
<https://www.transit.dot.gov/regulations-and-guidance/ccam/about/ccam-program-inventory>

The CCAM Program Inventory identifies 130 Federal programs that may provide funding for human service transportation for people with disabilities, older adults, and/or individuals of low income.

3. **“Federal Fund Braiding Guide.” Coordinating Council on Access and Mobility. 2020.**
<https://www.transit.dot.gov/regulations-and-programs/ccam/about/coordinating-council-access-and-mobility-ccam-federal-fund>

The Federal Fund Braiding Guide provides information for Federal employees and potential grantees on whether CCAM agency programs may participate in “Federal fund braiding,” or the use of Federal program funds to fulfil the match requirement of other Federal programs on eligible transportation projects.