

Deloitte. Driving Accountability in Non-Emergency Medical Transportation (NEMT): Preventing Potential Fraud, Waste, or Abuse (FWA)



Millions at stake: NEMT Exposed to Overpayment and Fraud by Policy Loopholes and Potential Bad Actors, Threatening Medicaid Benefit Integrity

State Medicaid programs face a complex landscape of constant and evolving risks for NEMT FWA



The **evolving nature of threats complicates identifying FWA schemes**, requiring frequent updates to assessment methodologies and tools.



Policy and **fee schedule vulnerabilities** may enable **overpayments** encouraging bad actors to disrupt public fund integrity.



Federal oversight of potential NEMT FWA elevates need for program integrity **cost savings and return on investment** of taxpayer dollars.

Deloitte's leading approach + Medicaid specialists and services = Safeguarding Millions from Possible NEMT FWA

Targeted Provider Reviews

Deloitte Consulting Services advises stakeholders to pinpoint Medicaid providers for pre- and post-pay audits using advanced billing analytics and NEMT-specific insights. Examples include:

Weekend + Holiday Billing

Inclement Weather + Natural Disaster Billed Dates of Service

Transport without Medical Claim

Provider Outlier + Trend Analyses

Custom Tech Deployment

Deloitte Consulting Services equip Medicaid programs with AI-driven analytics, GenAI, and automation, customized to existing systems, to uncover possible FWA, suggest strategic decisions, and improve ROI. Examples include:



Client specific analytics



Low code automation



AI Agents with Humans-in-the-Loop

Policy and Education

Medicaid specialists review current policy to address gaps in legislation and Program rules helping NEMT programs align with leading practices and decrease taxpayer dollar exposure. Sample strategies include but not limited to:

Cross reference some adjudications with existing policy

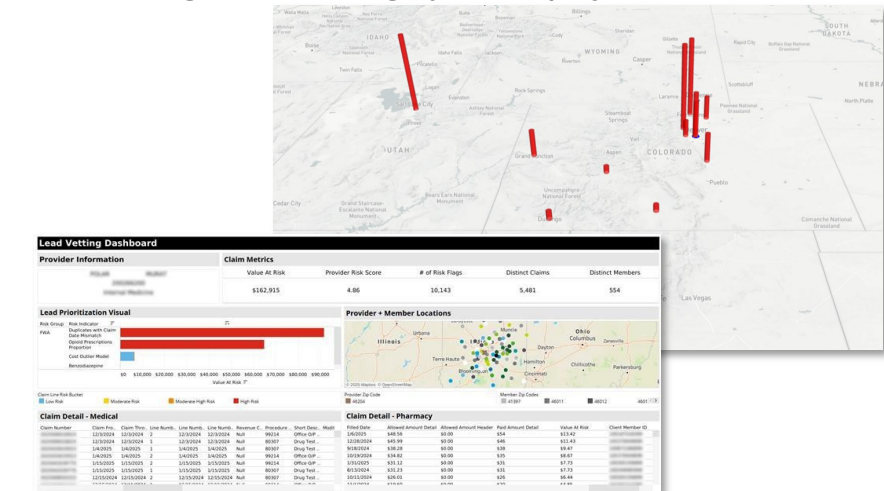
Identifying fee outliers across Medicaid programs

Guide providers on applicable billing and documentation

Facilitate State collaboration to mitigate FWA trends

Claims Review

Medicaid claim review teams rapidly audit providers, preventing overpayments and delivering cost savings for taxpayers.



Deloitte provides leading practices measurable impact for State Medicaid agencies.

- ✓ **Fee Schedule:** Identified fee schedule rates not reasonably aligned with other NEMT programs leading to a state client's fiscal year savings of **over \$175M**.
- ✓ **Prepayment Review:** Adjudicated **over 45,000 claims manually** in 24 months with a State Medicaid program **ROI of over 135%** and **\$24M in taxpayer cost savings**.
- ✓ **Broker Investigation:** Performed broad background **investigation** including **financial and business relationships** into a prospective Statewide broker identifying potential risk.
- ✓ **Custom Automation:** Created low cost-low code automation solution expediting a manual task **from 1 hour to <1 minute** saving a State Medicaid agency over 2 work weeks annually.

Contacts:



Jamia McDonald
Principal
Consulting Services LLP
jamcdonald@deloitte.com



Barton Bishop
Managing Director Deloitte Financial Advisory Services LLP
bbishop@deloitte.com



Lauren Allen
Principal
Deloitte Transactions and Business Analytics LLP
laurenallen@deloitte.com



Amina Popowich
Principal
Deloitte Financial Advisory Services LLP
apopowich@deloitte.com

This case study contains general information only and Deloitte is not, by means of this case study, rendering accounting, business, financial, investment, legal, tax, or other professional advice or services. This case study is not a substitute for such professional advice or services, nor should it be used as a basis for any decision or action that may affect your business. Before making any decision or taking any action that may affect your business, you should consult a qualified professional advisor.

Deloitte shall not be responsible for any loss sustained by any person who relies on this case study.

Copyright © 2026 Deloitte Development LLC. All rights reserved