**Recommended NCDOT Contributions to DMA PHP RFP: NEMT**

# DMA affirmation of Medicaid Transportation assurance/Commitment to Community Transit

## Description of NCDHHS/DMA Commitment to Honor Transportation Assurance

### 42 CFR § 431.53

#### DMA will require PHPs to ensure necessary transportation for beneficiaries to and from providers

#### Consistency with NC State Plan

## Coordination with Existing Community Transportation Programs

### Brief Description of Existing Community Transportation Network

#### Geographic Coverage

#### Types of Service

#### infrastructure and Support from Federal, State, and Local Resources

##### Critical Role of NCDOT in the Development and Maintenance of Community Transportation infrastructure/NEMT Benefits from Cost Efficiencies

###### Enrollee appropriate Rolling Stock/accessibility

###### NCDOT Technology

Computerized Scheduling Dispatch

Automatic Vehicle Location (AVL)

##### Required Uniform Safety and Training Requirements

###### A Single Standard for Public Transit/Human Service agencies Will Reduce Costs and Create Competition

Drug & alcohol Testing

Safety Plan

Annual mandatory validation of license status of drivers and pre-employment background checks.

Minimum Vehicle Safety Equipment

Bio-Hazard kit

First aid kit

Fire extinguisher

Bi-directional reflective triangles

Web cutters

Driver Training

Defensive driving

Ada Training

Sensitivity Training

Passenger assistance

Wheelchair Securement

Emergency Procedures

Reporting/investigation of accidents & incidents

### Past DMA experience in bidding brokerage reveals cost effectiveness of the NCDOT community transportation program

### Coordination Required

#### DMA recognition of substantial NCDOT investment in enrollee appropriate vehicles (efficient, accessible)

#### DMA recognition of NCDOT programming with other specialized transit infrastructure

##### DMA recognition that PHPs should participate in local Human Service Transportation planning efforts

### DMA goal to not compromise integrity of the existing substantial community transportation network that currently delivers significant NEMT

#### Ensure the continued viability and recognition of benefits of community transportation to enrollees for other than medical trips/non-covered medical trips

##### Recognize value of enrollee familiarity with existing service providers

##### Recognize enrollee expectation of service quality afforded by community transportation

##### Recognize the increased service capacity afforded enrollees for non-NEMT transportation services (i.e., public transit services) through leverage of NEMT funds as local match to provide additional public transit funding for the whole community including NEMT enrollees.

#### Recognize congressionally approved unique matching requirements that permit communities to leverage Medicaid funds to enhance services

### The PHP shall provide “right of first refusal” on trip assignments to community transportation providers when such providers are appropriate to enrollee needs and operate during the days/hours/service area to meet the enrollee’s trips needs.

# Goals for NEMT Under the Healthcare Transformation initiative

## Stakeholder feedback has consistently cited food insecurity, housing instability, and transportation challenges as critical barriers to health

## Transportation as a required element of benefits to be provided by the PHP

## Goals

### Better care delivery

### Healthier people, healthier communities

### Smarter spending

# Position on Carve-in/Carve-Out

## Responsibility of prepaid health plans (PHP) to determine how best to meet NEMT transportation assurance

### Broker

### Fee for service (FFS) arrangements directly with service providers

## All service providers must be registered in NCTRACKS

## Regardless of service delivery model chosen by PHP, must meet transportation standards as referenced in this RFP.

# NEMT Services

## Network/infrastructure

### Must correspond to the region/geographic area of the PHP and include all localities in that area

### If brokerage model used, broker may be:

#### For-profit entity

#### Private non-profit entity

#### Public entity

### If brokerage model used, PHP shall:

#### Apply uniform standards, regardless of organizational status on:

##### Limitations, if any, against self-referral

##### Allowable cost structures

##### Oversight

##### Annual cost structure review

### The PHP shall maintain a network of transportation providers large enough to adequately serve the diverse NEMT needs of eligible enrollees. The network of transportation providers may consist of public, not-for-profit, and for-profit organizations, as well as individual qualified operators. DMA will provide the PHP with detailed information on the scope of services provided by the existing community transportation network.

#### When appropriate to enrollee needs, ensure that community transportation providers have right of first refusal

### Assure that arrangements are made within each locality Statewide for the provision and reimbursement of non-emergency Medicaid transportation during non-business hours, and convey those arrangements to DMA.

### Check the ongoing eligibility of each enrollee prior to each transport.

### The PHP and/or its broker shall bear the expense of services provided by a transportation vendor that are later denied if this denial was due to errors on the part of the either the PHP or the broker, not the service provider.

### Ensure that prompt payment provisions to all NEMT service providers, to ensure that the PHP does not impose/create cash-flow problems for public, nonprofit, or small or economically disadvantaged service private for-profit providers.

#### Prompt payment timeframes refer to a properly submitted request for payment in NCTRACKS

#### Prompt payment is any payment made within fourteen (14) calendar days after submission of a properly submitted invoice.

### The PHP shall ensure that appropriate NEMT services are available to clients twenty-four (24) hours per day, seven (7) days per week.

#### these diverse modes of transportation may include any of the following:

##### Client’s personal vehicle.

##### Public transit system services, including bus or light rail service (Charlotte).

##### Standard vehicle/automobiles operated by volunteers.

##### Specialized vehicle including wheelchair van, stretcher van, or other type of modified vehicle.

##### Taxi service.

##### Non-emergency ambulance services, such as Basic Life Support (BLS) and Advanced Life Support (ALS).

##### Rail, air, interstate bus, intrastate bus, and other forms of public and private conveyance.

### Prior to the enrollment of a new transportation provider in the PHP’s network the PHP, or its broker, shall ensure that, at a minimum, the transportation provider meets the following requirements:

#### the transportation provider is enrolled in NCTRACKS.

#### all drivers of vehicles that will be transporting enrollees meet the Driver Requirements in this RFP.

#### all vehicles used by transportation providers meet the Vehicle Requirements in this RFP

#### all drivers of vehicles that will be transporting enrollees have completed the provider orientation and training in this RFP.

## Domicile

### If a brokerage option is used, the PHP or broker must establish a business office for the conduct of brokerage activities within the State of North Carolina.

### Call center operations must be established within each region to ensure familiarity with service area and reduce errant trip assignments.

## Contact Center

### The PHP shall establish and maintain adequately staffed telephone contact centers within the state. The PHP shall process all incoming telephone inquiries for NEMT in a timely, responsive, and courteous manner.

### The PHP shall establish and maintain at least one toll-free telephone number for enrollees and other individuals or organizations to call to request transportation services, obtain information about transportation services and register complaints.

### The PHP shall establish and maintain a dedicated line for medical providers to use regarding NEMT services.

### The PHP shall have available space, staff and call lines to accommodate any call volume increases.

### In the event that a caller will be in the call queue for longer than three (3) minutes, the PHP shall provide an automated system that will notify the caller of the anticipated wait time before their call will be answered.

### The PHP shall have sufficient, trained staff to handle all calls, and solve problems for transportation-related questions.

### The PHP shall have the capability to receive and respond to calls from enrollees who do not speak English, and enrollees who are hearing or speech impaired.

### The PHP shall install and maintain an automatic call distribution system and call reporting system. This system must have the capability of automatically routing calls to back-up, part-time operators when target wait times are exceeded.

### The PHP shall record all calls into the PHP’s contact center and archive those recordings. Notification shall be provided to enrollees of the recording at the time of recording. as needed by the PHP, or at the request of DMA, the PHP shall search, retrieve and replay any calls received.

### The PHP shall provide a system for auditing calls received by the contact center to determine the quality of the customer service provided by the PHP’s staff members and the accuracy of information provided to the individuals calling into the contact center.

### The PHP shall document all of its contact center policies and procedures and deliver those policies and procedures to DMA for Review and approval.

## Service Requirements

### PHP is required to arrange transportation to medical services which are closest to the enrollee’s place of residence. This can include a bordering county or region in North Carolina or a neighboring state.

### The transportation provider assigned the trip must immediately notify the PHP and/or broker if the provider does not have statutory operating authority in the jurisdiction of the trip destination.

## Provider Orientation and Training

### Once an entity or individual has been enrolled as a transportation provider in the PHP’s network, the PHP shall do all of the following:

#### Initial orientation

#### Clearly define service areas

#### Review of requirements for drivers and vehicles

#### Methods of transmission of trip assignments

#### Recordkeeping requirements for the provider

#### Invoicing/reimbursement procedures, forms, and protocols

## NEMT Eligibility

### The PHP shall verify that enrollees are eligible for NEMT services prior to providing a NEMT trip. An enrollee is eligible for NEMT when all of the following requirements are met:

#### The transportation service is to/from a Medicaid covered service, provided by a participating Medicaid provider.

#### The enrollee has no other private transportation, free transportation, or transportation covered by another primary insurance available.

## Assigning the Mode of Transportation

### General Requirements

#### The PHP shall determine the most appropriate mode of transportation based on meeting the enrollee’s medical need, and not on convenience for the enrollee or caregiver. The PHP shall use the following guidelines to select appropriate mode of transportation:

##### Consistent with the goals specified herein, the PHP shall use the existing community transportation network as the preferred provider if the provider has sufficient capacity to meet performance standards and has agreed to provide the trip.

##### If the enrollee has access to the local bus or light rail service, and it is appropriate for the enrollee’s medical condition, the PHP may provide tokens, passes, or vouchers. The PHP shall determine if individual tokens or passes are the most cost effective or appropriate.

##### The PHP shall select the least expensive mode of transportation that is appropriate for the enrollee.

##### If the Enrollee has multiple medical appointments, the PHP shall work with the medical provider and caseworker to coordinate appointments and select the most appropriate and efficient means of transportation.

##### The PHP shall document its procedures for determining the most appropriate mode of transportation and shall include a procedure for how it will process enrollees with reoccurring trips including, but not limited to, dialysis, chemotherapy, radiation, physical therapy and mental health services.

##### Nothing in this section shall prohibit a medical service provider from that requires client transportation at service levels that exceed those specified herein from negotiating contracts with a transportation provider. The medical service provider shall be responsible for costs of said services.

### Billing Computations

#### The NEMT provider reimbursement rate should be direct mileage based as calculated through a third-party mapping service (I.e., Google Maps or equivalent) that utilizes Cartesian cartography methods to assess the least roadway network distance between the enrollee’s origin and destination.

##### In this method, the enrollee’s trip origin and trip destination shall be evaluated using software tools, such as Google Maps, to determine the approximate travel distance for the trip.

##### Under this method, providers will charge PHP for the pre-determined direct mileage distance between the enrollee’s trip origin and destination, and any other intermediate trips authorized by the PHP, on the basis of the pre-determined direct mileage consumed.

##### The transportation provider shall be encouraged to employ shared-ride techniques in scheduling/dispatching of a range of passenger trips; however, the PHP shall only be responsible for Medicaid enrollee pre-determined direct miles.

##### If the transportation provider arrives at an enrollee’s location and the enrollee refuses to take the trip, is unable to take the trip, or simply does not present themselves for transport, and has not notified the PHP, the transportation provider shall be compensated for a negotiated no-show fee.

##### Transportation providers are responsible for notifying the PHP within the same business day for all no-shows.

### Requirements applicable to Community Transportation Providers

#### In most instances, the existing Community Transportation provider, will be low cost, appropriate provider. DMA shall require the PHP to coordinate, to the maximum extent feasible, with this network of providers for NEMT services. Unless the CTP is not the most appropriate mode given enrollee needs, the PHP shall offer right of first refusal in the trip assignment process to the CTP. Exceptions to this requirement include:

##### The destination of the service is outside the jurisdiction or service area of the CTP

##### The required trip is outside the hours and days of operation of the CTP.

#### Shared-Ride Services

##### Research, based on a North Carolina case study, has shown that costs to Medicaid can be reduced when NEMT services are delivered in a coordinated, shared-ride setting. The PHP shall ensure that CTPs are encouraged to schedule/dispatch NEMT in a share-ride mode whenever feasible.

###### When shared-ride modes are employed for passengers with common trip origins and destinations, the PHP shall be responsible for reimbursing the provider only for the equitable pro-rata share of services consumed by Medicaid enrollees.

###### The PHP shall develop rate structures that provides for incentive for providers to employ shared-ride modes.

###### In the event the PHP recognized comparable trip need for four (4) or more passengers from a common origin or common destination, the PHP may negotiate a group rate, rather than a shared rate or passenger mile rate with the transportation provider.

## Communication with Transportation Providers

### Reservation requests shall be made by the enrollee five days day prior to the date of medical service.

### Trip assignments shall be made and communicated to transportation providers three (3) business days prior to the day of transport.

### If for any reason the assigned provider cannot schedule the trip for the day of delivery, the transportation provider shall notify the PHP or broker two (2) business days prior to the schedule day of medical service so that the trip can be assigned to another provider.

## Transportation Provider Oversight

### The PHP shall provide oversight of and continuously manage the transportation provider network, including:

#### Ensuring that the vehicles used by the transportation providers to provide NEMT services to enrollees are properly maintained based upon criteria in this RFP

#### Addressing any safety concerns related to the vehicles used by the transportation providers to provide NEMT services to enrollees.

#### Service quality and performance measures cited in their RFP.

## Rate Structure(s)

### The PHP shall not be required to impose actuarially established rates or complex rate adjustments schemes for NEMT. However, the PHP shall be required to negotiate rates with service providers.

#### DMA recognizes the necessity of establishing adequate rates that promote the recruitment and sustainability of competent transportation providers with the managerial capacity to meet all imposed requirements, and provision of a quality, safe service to enrollees.

#### The PHP shall conduct annual review and negotiation of rates. This analysis shall take into account current practices and trends in fuel prices, competitive driver wages, etc. to ensure that a competitive rate environment exists to ensure an adequate supply of competent service providers is maintained.

#### All rate negotiations should take into consideration variation is service costs associated with differing locations, service delivery environments and operating conditions.

## Provider Reporting

### Record each trip on the DMA-2056, Transportation Log, or equivalent form that captures all of the DMa-2056 data fields.

## Provider Performance, incentives, and Penalties

### The PHP or its broker shall have responsibility for NEMT service monitoring. It should be the goal of DMA and the PHP to create a system that incentivizes excellent performance that contributes to efficient delivery of NEMT while ensuring corrective actions are required when clear adverse health impacts occur due to poor performance of the NEMT service provider.

### Performance shall be monitored on the following aspects of NEMT service provision:

#### Access to the call center

##### Key performance indicators

###### percent of calls answered within goal

Ex. 95% of Calls answered within 3 minutes

###### Percent of abandoned calls

Ex. <1% of calls abandoned

#### Service Quality

##### Key performance indicator

###### On-time pick-ups

Ex. 90% of trips pick-up within -15/+15 minutes of promised time

###### On-time drop off at the medical provider facility

Ex. 90% of Trips Drops-Offs within -30/0 of appointment Time

###### Excessive travel time

### Performance measures shall be established reflective of service delivery environment that exist throughout the state.

### In the event the PHP finds that a service provider is engaged in a pattern or practice of failing to meet these performance standards, the PHP shall notify the provider, in writing, as to the specific deficiencies. The PHP shall provide a finite period wherein the provider can remediate the performance difficulties. If, after providing opportunity to cure, the provider has been unable or unwilling to take corrective action, the PHP shall not assign trips to the provide for a specified amount of time.

#### This provision may be waived if there is a lack of registered providers in the service area.

#### In the event the provider that exhibits a pattern or practice of failing to meet these performance standards is a community transportation provider, the same opportunity to cure shall be provided following formal notice of the deficiency from the PHP. If the provider fails to cure the identified deficiencies, the PHP shall not be required to provide right of first refusal to this entity in trip assignments.

#### Performance measure infractions will not be addressed within the first 90 days of performance to allow the provider maximum opportunity to put in place necessary resources to meet demand

#### Performance infractions will not be if the transit provider can substantiate that failure to meet a performance goal was beyond the control of the provider (e.g., adverse weather, verifiable traffic conditions due to accidents, road work, etc.

### No financial penalties will be assessed for performance infractions (eliminating cost escalation practices that provide contingency for penalties).