



## Non-Emergent Medical Transportation Policy: Quality Assurance, Monitoring and Oversight

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<i>State(s):</i> <input type="checkbox"/> Idaho <input type="checkbox"/> Montana <input checked="" type="checkbox"/> Oregon <input type="checkbox"/> Washington <input type="checkbox"/> Other:	<i>LOB(s):</i> <input type="checkbox"/> Commercial <input type="checkbox"/> Medicare <input checked="" type="checkbox"/> Medicaid <input type="checkbox"/> PSA
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### Government Policy Non-Emergent Medical Transportation Policy: Quality Assurance, Monitoring and Oversight

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Non-Emergent Medical Transportation services are transportation services to provide CCO members with access to transportation to a covered health care appointment or flexible services, including mileage, meals, and lodging. This is for scheduled health care appointments, not emergencies. PacificSource has contracts with local transportation brokerages to provide non-emergent transportation services to members.

#### Requirements:

PacificSource will pay for coordination and provision of NEMT provided for members if the member is eligible for NEMT. Contractor’s responsibility and member eligibility for NEMT is specified in OAR 410-141-3920 through 410-141-3965, as well as the Coordinated Care Organization (CCO) contracts with the Oregon Health Authority (OHA), Exhibit B, Part 2.

PacificSource is responsible for ensuring members have access to safe, timely, appropriate NEMT services. PacificSource, in coordination with the NEMT brokerage(s), has developed and implemented systems, supported by written policies and procedures, to describe the process for receiving member requests, approving NEMT services, scheduling, assigning, and dispatching providers, grievances, ongoing monitoring, evaluation and improvement of quality and appropriateness of NEMT services, contingency plans, back-up plans, critical care, significant events/incidents/accidents, and adverse weather conditions. PacificSource reviews and approves the NEMT brokerage’s policies, per the NEMT Subcontractor Agreement between PacificSource and the NEMT brokerage. This policy will summarize the minimum expectations of policies, monitoring, and oversight conducted by or performed by the NEMT brokerage. This policy incorporates the Medical Ride Program Guide to address policies and procedures required in the CCO contracts and OARs, related to NEMT.

PacificSource oversees the subcontracted Work performed by the NEMT brokerage(s), in accordance with the CCO Contract, Exhibit B, Part 4, section 12 and Exhibit B of the NEMT Subcontractor Agreement. A Pre-Delegation Assessment will be performed prior to entering into a contract with an NEMT brokerage, in accordance with the CCO Contract, Exhibit B, Part 2, section 6 and 42 CFR 438.66(d). The results of the assessment will be documented and provided to the OHA, as requested.

PacificSource will be responsible to ensure that the subcontracted NEMT brokerage(s) comply with the terms and conditions set forth in Exhibit B, Part 2, section 5, Para. e of the CCO contract.

## **Procedure: Quality Assurance, Monitoring and Oversight**

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**MEETINGS:** PacificSource and the NEMT brokerage(s) will have frequent meetings, typically quarterly, but no less than quarterly, to discuss upcoming items, goals, compliance, subcontracted work, and topics as determined prior to the meeting. Each meeting will be documented with agendas and meeting minutes.

**QUALITY ASSURANCE PROGRAM:** PacificSource will continually monitor the NEMT brokerage to conduct an annual Quality Assurance Plan related to NEMT services. The PacificSource Quality department is responsible for documenting the plan outcomes. Activities conducted by the Quality department will include monitoring, evaluation, and improvement plans for these services. The plan will be documented and submitted with the annual compliance plan/FWA Prevention Plan. This plan shall include, at minimum:

1. PacificSource shall collect data about its NEMT operations, including its NEMT Call Center, and submit such data to OHA on a quarterly basis using the NEMT Quality Assurance (QA) Guidance Document and reporting template provided, on the CCO Contract Forms Website.
  - a. Such quarterly data reporting shall not be Delegated by Contractor to a third-party.
  - b. PacificSource is responsible for validating and submitting all quarterly NEMT QA Reports. All such data collection and documentation are subject to the requirements set forth in OAR 410-141-3520.
2. The quarterly NEMT QA Reports shall be provided to OHA, via Administrative Notice, by no later than ninety (90) days after the end of each calendar quarter.
3. PacificSource shall analyze data collected about its NEMT operations, including the NEMT Call Center and any other data required to be collected and documented under this Sec. 5 of Ex. B, Part 2 as is necessary to perform Quality Improvement, fulfill the reporting and Monitoring requirements as required under this Contract, and ensure adequate resources and staffing.
4. The Quality Assurance Plan includes the following;
  - a. Procedures for monitoring and improving member satisfaction with NEMT Services must include, without limitation; processes for accepting NEMT grievances from members and from others acting on the members' behalf, including medical providers.
  - b. Processes for conducting member satisfaction surveys on a regular basis.
    - i. PacificSource and the NEMT brokerage(s) shall develop member satisfaction surveys that include questions about the call center, scheduling, transportation, and overall experience.
    - ii. Follow-up member satisfaction surveys will be sent to, and collected from, a minimum of 10% of all members who were provided NEMT rides.
    - iii. Survey results shall be analyzed to determine trends and improvement recommendations to be developed in response.
  - c. Procedures for ensuring that all NEMT Services paid for are properly approved and actually rendered, including but not limited to validation checks and an annual analysis matching claims/encounters for services for which CCO is fully or partially financially responsible based on the Member's CCO plan type and NEMT claims/encounters.
    - i.

- d. Procedures for monitoring and improving the quality of the transportation provided pursuant to this contract.
- e. Monitoring Plan for NEMT Providers to ensure compliance with OARs 410-141-3920 through 410-141-3965, which shall include, without limitation: Verifying that provider vehicles are accessible for members including those members with disabilities, or other Special Health Care Needs (e.g., wheelchair restraints for wheelchairs, etc.).
- f. Conducting, and maintaining documentation of, background checks on all drivers including criminal history, driving history, sex offender status, and drug testing.
- g. Providing, or ensuring that drivers have attended, and documentation thereof, appropriate training for the level of services being provided (e.g., door to door vs, curbside to curbside), how to assist members with disabilities, and other Special Health Care Needs, and how to serve passengers in a culturally aware manner.
- h. Verifying, and documentation thereof, NEMT Service Subcontractors have and maintain appropriate workers compensation, general liability, and automotive Liability Insurance.
- i. Auditing and documentation thereof, a percentage of daily rides for claims data, pick-up, and drop off times, appropriate level of transport, and member satisfaction.

**REPORTING:** The NEMT brokerage(s) will send monthly, quarterly, and ad-hoc reports PacificSource for review, according to Exhibit B of the Subcontractor Agreement. PacificSource has implemented the following procedures in operationalizing this Policy:

1. Monthly Reporting

- a. Self-reported monthly summary of NEMT service activity, including, but not limited to, total unique members served, Call Center performance results, denials by category, transportation by modes and service level, exclusion checks, and other required data element per the Agreement.
- b. The NEMT brokerage(s) will report the results of monitoring at least 1% of calls of each NEMT Call Center staff.
- c. Complete Grievance System Log meeting the OHA requirements including all grievances the brokerage received in the applicable timeframe, including a log of any incidence of a driver failing to show up for a requested transport, and Notices of Adverse Benefit Determinations (NOABD) issued. PacificSource populates the encounter claims portion of the Grievance Log report.

2. Quarterly Reporting

- a. A raw data file detailing out the transportation services provided for the quarter, to be analyzed by PacificSource.

3. Annual Reporting

- a. Training and Education reports summarizing the dates and types of training the staff and providers/drivers have received for the previous calendar year.

**MONITORING:** PacificSource monitors the reports using the following standard practices:

- 1. Monthly, quarterly, annual, and ad-hoc reports will be monitored at the frequency at which they are received. Monitoring includes, but is not limited to the summary of outcomes, outlier evaluations, trending and patterns, utilization rate changes (+/-), rides provided vs. scheduled, and capacity monitoring.
- 2. Summaries of the monitoring efforts are retained and reported to the NEMT brokerage, quality committees, and other committees as deemed necessary.

## **OVERSIGHT:**

1. PacificSource will conduct, at minimum, an annual oversight audit of the subcontracted Work, according to the Subcontractor Agreement, Exhibit B as well as the CCO Contract, Exhibit B, Part 2, section 5(f)(2)(d). The annual scope of the audit will include each subcontracted function in the agreement, including policies.
  - a. The NEMT brokerage will provide, annually as part of the annual oversight audit, to PacificSource copies of current policies and procedures of the subcontracted Work, including, but not limited to Timely Access, Processing Member Requests, Approving NEMT services, Scheduling/Assigning and Dispatching Providers, Significant events/incidents, Adverse Weather Plan, and Contingency and Back-Up Plans. PacificSource will review and provide the NEMT brokerage notice of its approval or disapproval of its policies and procedures within 30 days of receipt.
2. The outcome of the audit will be reported to the brokerage in a formal evaluation notice, outlining the areas of compliance and if there will be any corrective actions issued.
3. The annual oversight audit will be provided to the OHA's Contract Administrator, via Administrative Notice, within 30 days of completion of the audit. The audit must include the following minimum elements:
  - a. An assessment of the quality of NEMT brokerage's performance of subcontracted Work;
  - b. Any complaints or Grievances filed in relation to the subcontracted Work;
  - c. Any late submission of reporting deliverables or incomplete data;
  - d. Whether employees of the NEMT brokerage(s) are screened and monitored for federal exclusion from participation in federal programs;
  - e. The adequacy of the NEMT brokerage(s) compliance functions;
  - f. Any deficiencies that have been identified by the OHA related to work performed by the NEMT brokerage(s).
4. The NEMT brokerage will develop, in partnership with PacificSource, NEMT Call Center scripts for calls requesting NEMT services, which include a sequence of questions and criteria that the NEMT Call Center representatives shall use to determine the member's eligibility for NEMT services, the appropriate mode of transportation, the purpose of the trip, and all other pertinent information relating to the trip. Any script for use with a member shall be written at the sixth (6<sup>th</sup>) grade reading level and must be submitted to PacificSource for review. PacificSource will submit finalized scripts to the OHA for approval and will notify the NEMT brokerage of approval or disapproval. Revisions will be made and resubmitted as requested from the OHA materials reviewer.

**CORRECTIVE ACTION PLANS:** PacificSource will take the following actions related to the NEMT brokerage(s) failure to meet requirements:

1. When a deficiency is identified, PacificSource will issue a corrective action to NEMT brokerage using the PacificSource corrective action plan reporting process, as outlined in the *Subcontractor Corrective Action Plan Policy*.
2. PacificSource will notify the NEMT brokerage of the deficiency through a formal corrective action notice. Upon such notice, PacificSource will notify the OHA of the Corrective Action Plan (CAP) within 14 days after issuing the CAP, through Administrative Notice.
3. Upon removal of the CAP, PacificSource will notify the OHA, through Administrative Notice, of the successful remedy of the CAP or if the NEMT brokerage failed to fully remedy the underlying deficiency, if the deadline for the remedy has passed.

**STAFF COMMUNICATIONS:** PacificSource will distribute updates or changes to PacificSource employees and the NEMT brokerages as needed. These communications will be sent via policy or email or delivered in team meetings. PacificSource staff have continual access to company policies through the intranet on the PS Web. In addition, leadership reviews and approves policies through the Government Operations Committee, and other committees as needed.

## Appendix

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**Policy Number:** NEMT-02

**Effective:** 1/1/2022

**Next review:** 11/1/2025

**Policy type:** Government

**Author(s):** [Authors]

**Depts:** Provider Network

**Applicable regulation(s):** CCO Contract Deliverable

**External entities affected:** NEMT Brokerages

**OHA Approval:** February 15, 2023