

# NON-EMERGENCY MEDICAL TRANSPORTATION

Recap of Activities

November 3, 2011

# July 14, 2011 Public Meeting at Brownstone Hotel

- **Power Point Presentation with open discussion and Q & A after presentation**
- **Discussed 2007 Quality Assurance Audit Issues**
- **Discussed CMS Compliance Issues noted in 2008, noted there will be another one soon**
- **Noted that Quality Assurance is currently conducting an audit on NEMT**
- **Recommendations were to slow down and explore different methods of management/delivery of NEMT without having CMS compliance problems, and also work on correcting the perceived problems.**

## **July 27, 2011 Follow-up Meeting**

- **Rebecca Troutman, Nancy Coston, Sherry Bradsher, Linda Wallace, Miriam Perry**
- **Agreed to move forward with establishing a Stakeholder group without waiting for Executive Order 21 to re-establish Human Services Transportation Council**
- **Each will recommend the names of 3 to serve as Stakeholders**

## July 27 Follow-up Meeting

- **Stakeholders represent their organization/agency/association**
- **Discussed the previous DMA audits**
- **Agreed coordinating audits with DOT was a good way to proceed**

## **August 18 Stakeholder Meeting at DOT**

- **Tara presented Talking Points**
- **Much group discussion on 2007 QA audit and CMS 2008 Compliance Review**
- **Tara wrapped up with “we will do lessons learned from the 2007 and 2008 audits” and urged the group to “figure out a way to fix the problems with NEMT, come up with ways to reduce costs and the error rate, revise the current policy, and present it in the comprehensive statewide Transportation Plan to be submitted to DMA by October 15”.**

## **August 18 Stakeholder Meeting at DOT**

- **Carolyn briefed group on current policy and draft revisions, provided copies of current policy, emailed draft revisions after meeting**
- **Sheila distributed copies of DMA Administrative Letter 04-07, Quality Assurance 2007 Audit Results**
- **Sheila shared preliminary findings from the current QA audit**

## September 14 Stakeholder Meeting at DOT

- **Established sub-workgroups and assignments for each: Cost Reduction, Policy, Training and Communication Plan**
- **Distributed proposed DMA timeline for revising policy, training staff, performing audits, performance feedback, on-going monitoring**
- **Requested sub-groups to begin meeting and working to develop draft plan**

# September 29 Meeting at Wake County Human Services

- **Sheila stated goal for this meeting is to build the framework for the Plan using the draft policy as the guiding force**
- **Sheila noted the Plan should include background/history to show how we have reached this point; benchmarks and goals to show where we want to be; and reports from each sub-group on how we will get there, i.e. cost reduction methods, error rate reduction methods, how we will provide training, how to revise the policy and forms to make it standard statewide.**
- **Distributed the benchmarks and goals document in draft form, and completed the blanks as a group during the meeting.**

## Draft Transportation Plan

- **October 11, 1st comment period**
- **October 12, 2nd comment period**
- **October 13, 3<sup>rd</sup> comment period – extended to 10/24/2011**

## Phone Meetings

### – October 14, 2011 Phone Meeting

- Meeting held at the request of Linda Wallace, Rob Brink, Albert Eby, Don Willis

### – October 26 Phone Meeting

- Meeting held with Linda Wallace to clarify statements of October 14 meeting

# **CMS Exit Conference October 24, 2011**

## **NEMT cited in multiple areas:**

- **The state agency does not maintain adequate oversight and control of the NEMT program. The CAP submitted in response to the 2008 review was not implemented.**
- **The state does not capture all ownership and control information required in 42 CFR 455.104:**
  - **Does not collect complete information on NEMT providers.**

## **CMS Exit Conference October 24, 2011**

- **The state agency does not collect business transaction disclosures for the NEMT program:  
42 CFR 455.105**
- **The state agency does not capture criminal conviction information for the NEMT program:  
42 CFR 455.106**

# Issues Addressed with the Fraud and Abuse Management System

- Analyzing claims filed Jan 2009 – December 2009 (10.4M) (back in 2010 and code billing only)
- Non-emergency and non-medically necessary trips
- Round trips billed as one way
- Out of county mileage abuse
- Dual enrollee issues

# Draft Transportation Plan

- Stakeholder concerns

