



October 16, 2017

Tip Pom  
NEMT Contract Manager  
Department of Health Services

Since the beginning of the NEMT brokerage system in Wisconsin in 2011, stakeholders, advocates and providers have continued to monitor the brokerage program throughout its over six years of operation, two vendors and one audit. After the first broker left the state abruptly, a group called the NEMT Alliance suggested several improvements to the next request for proposals (RFP) issued by the state Department of Health Services (DHS). Many of these individuals and groups continue to be involved in the Transportation Advisory Council (TAC) that DHS convenes twice a year. The TAC was asked to provide feedback on the RFP that will be released by the Department prior to a new vendor contract in 2018. TAC members and others listed below are asking the Department to address these issues in the new RFP to improve service delivery, system efficiency and oversight.

- Previous RFPs were written in a way that prohibited Wisconsin companies from applying. We ask that language is removed to allow for Wisconsin businesses to use their knowledge of services and expertise in WI to bid on the contract.
- Allow for regional brokers to recognize the diversity of service areas in the state and the unique delivery issues in each region. If regional brokerage is not possible, allow sub-contracting to regional entities.
- Change the reimbursement to the broker from a per member per month (PMPM) rate to a fee-for-service model that reimburses the broker for successfully completed trips.
- Base performance on completion of trips to get to care appointments and not on substantiated complaints.
- Require ongoing and continuing member education and outreach to new and existing members with outcome measures available to the public to gauge compliance with this requirement.
- Require broker to have experience working with individuals with all types of disabilities and of all ages.
- Ride coordination should be looked at favorably in scoring bids, as well as ability to work successfully with public transit entities, specialized medical vehicles, volunteer driver programs, other existing transportation services and healthcare facilities whenever possible.
- Create a process for consumers or providers to be reimbursed for expenditures related to obtaining or providing transportation in the event of broker error or omission.

- Keep the vendor’s transportation provider lists open to the public to ensure public safety and fair competition within the transportation network.
- Improve data systems for collection and maintenance of member disability determination that allows for permanent disability status without the need for periodic renewals.
- Improve data reporting for trip denials and cancelled trips. These trips should be recorded with the following information: date trip was requested, date and time service was to be provided, date and time of cancellation, party requesting the cancellation or reason for denial. Such information should be in the public domain and regularly reported to the advisory council.
- Mandate an advisory council that meets more than twice a year, has oversight powers, and is engaged in determining performance metrics that gauge performance.
- Create an external complaint and grievance process including an Ombudsman for members and a liaison for providers to handle service and payment disputes. Under the current arrangement with HP, the contract terms do not required HP to perform the comprehensive duties that were requested under the Request for Proposal (RFP) released in June of 2014. We ask the external ombudsman responsibilities to include the following functions that were sought in the Request for Proposal S-0201:
  - Perform semi-annual auditing services of the NEMT Manager’s Complaint Reports.
  - Provide information, education and training about how to obtain NEMT through the NEMT Manager;
  - Work directly and collaboratively with 3rd parties and the State regarding the adjudication of complaints;
  - Work in conjunction with the NEMT Manager, including but not limited to the Member Ombudsman, to investigate and resolve issues quickly;
  - Perform research and provide recommendations to the State on the current state of the NEMT program;
- Exempt Ambulance providers, BLS and ALS from the brokerage and allow this specialized group to provide and bill for transportation directly with the state DHS. It is recognized that ambulance providers have highly trained and specialized staff whose training goes far above the requirements of NEMT brokerage providers. This exemption will not affect the provision of other specialized services like stretcher and bariatric trips which are not provided by ambulance providers who are contracted to provide ambulance service through the Medicaid broker.
- DHS to consult directly with tribal governments prior to releasing the RFP to honor Tribes as sovereign governments relating to the Federal Medicaid program.

NEMT is a critical benefit for some of Wisconsin’s most vulnerable citizens. Missing routine, preventive care can lead to increased and unnecessary costs and hospitalization. A January 2016 report by the United States Government Accountability Office concluded that the NEMT benefit “can be an important safety net for enrollees as research has identified the lack of transportation as affecting Medicaid enrollees’ access to services.” We applaud the Department’s commitment to the provision of NEMT and provide these suggestions to enhance the efficiency and effectiveness of this state program.

Sincerely,

Aging & Disability Professionals Association of Wisconsin

Aging & Disability Resource Center of Portage County

Aging & Disability Resource Center of Washington County

\*Disability Rights Wisconsin

Kenosha County Aging & Disability Resource Center

\*Greater Wisconsin Agency on Aging Resources, Inc.

Northeast Wisconsin Regional Access to Transportation Committee

\*Professional Ambulance Association of Wisconsin

\*Specialized Medical Vehicle Association of Wisconsin

Survival Coalition of Wisconsin Disability Organizations

Vilas County Commission on Aging

Wisconsin Aging Advocacy Network

Wisconsin Association of Mobility Managers

Wisconsin Coalition of Independent Living Centers

Wisconsin Council of the Blind and Visually Impaired

Wisconsin Faith Voices for Justice

\*TAC Member

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