

# PEOPLE-CENTERED TRANSPORTATION COALITION

January 12, 2018

Kimberley Smith  
Compliance & Stakeholder Relations Unit Manager  
Colorado Department of Health Care Policy & Financing  
1570 Grant Street  
Denver, CO 80203

Dear Ms. Smith,

I am writing on behalf of the People-Centered Transportation Coalition (PCTC), which is an unincorporated group of about 30 organizations that represent or provide health care and transportation services for Medicaid eligible individuals. The PCTC is very concerned about the future of Non-Emergency Medical Transportation (NEMT) in Colorado, in particular as it relates to the current nine-county broker model.

We welcome the creation by the Colorado Department of Health Care Policy & Financing (HCPF) of the new Transportation Services Benefits Collaborative (Collaborative). Thank you for the opportunity to offer solution-focused recommendations, to be a participant in this ongoing process to revise the rules controlling NEMT, and to develop the new state contract for the provision of NEMT in adherence to those rules. We believe that our recommendations, and our ongoing engagement in this multi-step process will significantly contribute to improved health transportation experiences for patients, health care providers, and transportation providers - and all at lower costs for HCPF.

Attached are the PCTC recommendations for high-level changes to the NEMT rule and suggested inclusions in the new request for proposals (RFP). We understand that these recommendations could best serve either the rule or the RFP, or both. We believe that our recommendations directly align with and support HCPF's wish to have additional elements addressed in the new RFP, such as on demand transportation, urgent transportation needs, complaints process, satisfaction surveys, company report cards, reporting requirements, and other important elements not yet listed by HCPF.

During the January 8 Collaborative meeting, you suggested additional stakeholder meetings, and a separate carve out meeting to specifically address NEMT issues including the rule and RFP. We strongly support your suggestion and request the continuation of a dialogue as soon as possible. We are glad to offer the expertise of our participant organizations in any additional way that will make this Collaborative productive. Again, we greatly appreciate your initiation of this Collaborative and we look forward to ongoing engagement with HCPF concerning NEMT improvement.

Sincerely,

Chris Lyttle, JD  
**Public Policy Manager**  
People-Centered Transportation Coalition

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## Recommendations to the Department of Health Care Policy and Financing: State Rules and Request for Proposals for Nine-County Non-Emergency Medical Transportation Contractor

1. **INDEPENDENT BOARD.** An independent board must be established.
  - a. Independent board must be comprised of recipients of Medicaid services, health care providers, and transportation service providers.
  - b. Independent board will design and conduct periodic (but at least annual) and separate quantitative and qualitative satisfaction surveys for customers (patients), health care providers, and transportation providers, all of which will be administered by independent third parties.
  - c. Independent board must be empowered to establish an appeals/review process for (but not limited to):
    - i. Denial of trips
    - ii. Denial to transportation providers of inclusion in provider networks
    - iii. Incentive payments to contractor for meeting baseline standards
    - iv. Penalties/payment withholding to contractor for failure to meet baseline standards
    - v. Maintenance of an adequate, diverse, and patient-centered provider network for the provision of appropriate transportation.
2. **PUBLIC REPORTS.** All required monthly and annual reports must be made public in a timely manner and in a format that excludes personal health information and history.
3. **COVERED SERVICES.** Contractor must make list of covered services readily available to public. The list of services must be in alignment with State Medicaid Plan and approved by HCPF. No service approved by the State Medicaid Plan may be denied to any otherwise qualified NEMT user.
4. **VERIFIED ELIGIBILITY.** Contractor must verify that clients are eligible for Medicaid at any date within the month the trip is requested. Contractor must document and inform the client about the specific reason for any denial of transportation based on eligibility. Contractor must provide the client with adequate notice so that the client can have time to arrange alternative transportation.
1. **ALTERNATIVE CHOICES.** Health care providers must be reimbursed through NEMT funds in instances where health care providers make alternative transportation choices (independent of the Contractor) in the best interest of the client.

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2. **DEFINITIONS.** The revised rule and new RFP must have clear and controlling definitions. Of particular concern are definitions for:

- Patient-centered
- Person-centered planning process
- Access
- Adequate Network
- Appropriate transportation
- Alternative transportation
- Independent board
- Quality
- Outcomes
- Periodic survey
- Satisfaction survey
- Responsive
- Grievance
- Grievance and appeal system
- External quality review
- Public report
- Adequate notice
- Informed client
- Limited English proficient (LEP)

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### Participating Organizations as of January 2018

All Cities Taxi
Amblicab (Colorado Springs)
Asia Pacific Development Center
Aurora Health Access
Aurora Mental Health
Center for Health Progress
Children's Hospital Colorado
Clinica
Colorado Access
Colorado African Organization
Colorado Cross-Disability Coalition
Colorado Public Health Association
Community Enterprise Development Services
Community Health Partnership
Denver Health
Denver Regional Mobility and Access Council
Disabled Resources Services
Fresenius Medical Care
Heart and Soul Paratransit
Larimer County
Metro-Community Provider Network
Mile High Health Alliance
North Colorado Health Alliance
Northern Colorado Medical Transportation Action Coalition
Regional Transportation District
Salud
The Arc Larimer County
Together Colorado
Tri-County Health Department