



March 14, 2019

Secretary Palm,

The **Wisconsin Aging Advocacy Network** is a collaborative group of individuals and associations working with and for Wisconsin's older adults to shape public policy to improve their quality of life.

Core member organizations:

Aging and Disability Professionals Association of Wisconsin (*ADPAW*)

Alzheimer's Association SE Wisconsin Chapter

Wisconsin Adult Day Services Association (*WADSA*)

Wisconsin Association of Area Agencies on Aging (*W4A*)

Wisconsin Association of Benefit Specialists (*WABS*)

Wisconsin Association of Nutrition Directors (*WAND*)

Wisconsin Association of Senior Centers (*WASC*)

Wisconsin Institute for Healthy Aging (*WIHA*)

Wisconsin Senior Corps Association (*WISCA*)

Beginning in 2011, Wisconsin switched from the county-based system to a statewide brokerage model for the non-emergency medical transportation (NEMT) benefit for Medicaid members. While there have been concerns with this brokerage model, the transportation benefit for Medicaid members who need it is critical to accessing to services and ultimately, achieving better health outcomes.

Over the last 8 years, advocates have worked with the state and broker to improve the program for all stakeholders and members. The state managed an unexpected transition when the first vendor abruptly left the state and anticipated a planned transition this spring after the most recent rebid of the contract. As you know, this transition did not occur due to a protest of the award and the resulting decision to rebid the contract. The legal challenges related to the contract award and the resulting delays in awarding a new brokerage contract lead to increased confusion, uncertainty and lower quality and availability of service throughout the state.

Lack of communication by DHS with members, providers, advocates and the Transportation Advisory Council (TAC) charged to oversee this program, led to rampant rumors and dissemination of incorrect information. We are pleased to see the NEMT: Manager Transition webpage has been updated to reflect the current status of the program, as much confusion remains.

Our network partners report ride availability and service quality through MTM has declined substantially in the past few months. Many are reporting missed rides, no providers available and suggestions from MTM to use 911 or ambulance if they really need the ride MTM is unable to provide. These are serious matters and clear indications that MTM is not meeting their contract obligations.

WAAN is concerned about the lack of access to the transportation benefit for eligible Medicaid members and requests the Department of Health Services and the legislature take immediate action to intervene and address service failures of MTM throughout the new procurement period and during the transition process, if applicable.

Some ways DHS can manage the uncertainty and service quality include the following:

- Third-party oversight and ombudsman services for both consumers and transportation providers.
- Reimbursement to providers not contracted through MTM who provide rides when MTM fails.
- Increased communication with and through the Transportation Advisory Council including prior to rebidding the contract to get input from stakeholders on improvements to the program.
- Ongoing updates on the DHS NEMT webpage to keep providers, participants, and other stakeholders informed of the status of the program and including links and contact information to third party oversight and ombudsman services.

Contact WAAN

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Third-party oversight and ombudsman services for consumers and transportation providers

- Contract with an independent, third-party entity outside the NEMT broker to:
 - Act as a NEMT Ombudsman for Medicaid members and allow for direct filing of complaints to this ombudsman;
 - Work directly with the NEMT broker, contracted NEMT providers, and the State regarding the adjudication of complaints;
 - Perform regular auditing services of the NEMT Manager's complaint reports during the rebidding process and potential transition;
 - Act as an ombudsman for transportation providers who struggle to work with MTM in good faith who cannot get a contract or get paid for rides given.
- Track and analyze NEMT consumer complaints and trip failures including no-shows, late pick-ups, and rides that arrive late and or result in missed medical appointments. Compare complaints to pre-transition numbers and adjust vendor payment accordingly.
- Report to the legislature on the rebidding progress, all required quality measures, breakdown of the number of rides receiving full, partial, and no payment under DHS's pay for performance schedule, liquidated damages, and the number of clients/providers reimbursed for expenditures related to broker error.

Reimbursement to providers not contracted through MTM who provide rides when MTM fails.

- Create a process for consumers, agencies and transportation providers to be reimbursed for expenditures related to obtaining or providing transportation for rides MTM failed to provide during the process of rebidding and possible vendor transition.

Increased communication with and through the Transportation Advisory Council

- Recommend improvements to the RFP for the rebidding of the contract.
- Inform the council on changes in the program by meeting monthly or as needed during the rebidding process so members can help communicate to members and other stakeholders.
- Monitor quality data.
- Monitor consumer complaints and NEMT complaint auditing.
- Recommend additional NEMT performance metrics, and other policy changes to improve the quality and cost-effectiveness of the NEMT program transition.

During these uncertain times, WAAN is asking the Department to increase oversight and communication about the NEMT program and provide avenues to assist consumers to get the benefits for which they are entitled and for which MTM is being paid to provide. We stand ready to help DHS make improvements for customers, providers and the State.

Sincerely,



Robert Kellerman, Chair
Wisconsin Aging Advocacy Network

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