



DEPARTMENT OF HEALTH AND HUMAN SERVICES  
DIVISION OF MEDICAL ASSISTANCE

ROY COOPER  
GOVERNOR

MANDY COHEN, MD, MPH  
SECRETARY

DAVE RICHARD  
DEPUTY SECRETARY FOR MEDICAL ASSISTANCE

September 22, 2017

Re: Non-Emergency Medical Transportation (NEMT) Audit Finding Report Corrective Action Plan

Dear County Director of Social Services:

MA-2910/3550 Non-Emergency Medical Transportation (NEMT) policy provides the background and policy principles for the implementation of the NEMT program. Title XIX of the Social Security Act requires that state Medicaid programs fulfill administrative requirements necessary to operate the Medicaid program efficiently. Among these administrative requirements is the mandate that State Plans, "specify that the Medicaid agency will ensure necessary transportation for beneficiary to and from providers" (See 42 CFR 431.53).

The Office of Inspector General (OIG) has completed the Non-Emergency Medical Transportation audit for SFY 2013 – 2014. The findings from the audit are consistent with the findings cited in the audits conducted by KFH from prior years. The findings were related to arranging and/or paying for transportation, which include, but not limited to:

- 1) Non-suitable mode of transportation;
- 2) Excess mileage reimbursement charges;
- 3) Failure to implement contract agreement requirements
- 4) Incomplete transportation forms (5048/5118) and
- 5) Lack of documentation to verify a NEMT service provided

Based on those findings, DMA is required to implement a Corrective Action Plan (CAP) to ensure quality standards are in place for the administration of NEMT services to eligible Medicaid beneficiaries. As local agencies continue to work on quality tools in the Medicaid eligibility programs, NEMT will be included in the process. Monitoring, training and follow-up are key to ensuring timely and accurate identification and correction of deficiencies in NEMT. DMA must implement a CAP to ensure that we achieve and maintain compliance moving forward.

To comply with the DMA NEMT CAP, local agencies are required to follow the NEMT policy in Section MA-2910/3550:

- 1) Create a NEMT transportation folder for each individual or family. Although this is currently required by policy, this is a reminder to the local agency of the importance of documentation and availability of NEMT information.

- 2) Participate in NEMT policy webinar training conducted by the Operational Support Team. Additional information on the training schedule will be provided. The subject of the training will be the NEMT policy revisions, clarifications and processes. Individuals responsible for the vendor contracts are required to attend the training. Following the training, the webinar will be posted in the Learning Gateway to track participation of all local agencies.
- 3) Directors are required to attest that NEMT providers are meeting contractual requirements, including Attachment J, such as ensuring drivers are at least 18 years of age and properly licensed to operate a vehicle. This can be accomplished by periodically pulling a sample or requiring periodic site visits. Directors are also required to ensure that NEMT providers are reviewing driving records every 12 months and are periodically providing a sample of their reviews to the local agency.
- 4) As required by policy, the local agency conducts 2<sup>nd</sup> party reviews of 2% or 200 trips, whichever is less, on a quarterly basis. The DMA-2056, Transportation Log, or equivalent, is used to pull the sample and the DMA-5078, Medicaid Transportation Monitoring Report, is used to document findings. If necessary, the local agency must take appropriate corrective action after analyzing the results, which may include policy and functionality training. As part of the NEMT CAP, DMA has created a tracking sheet (attached) for the local agencies to document the corrective action taken and be provided to the State quarterly.
- 5) The Correction Active Plan must be implemented no later than October 12, 2017. In order to establish a baseline (starting point), 2<sup>nd</sup> party results conducted in September 2017 will be sent to DMA. This report is due October 31, 2017. Ongoing, results will be sent to DMA on a quarterly basis. Please forward your results to the Operational Support Team (OST) at [ost.policy.questions@dhhs.nc.gov](mailto:ost.policy.questions@dhhs.nc.gov).

Providing this information to the State allows more transparency in the process and provides evidence to submit to the Office of Internal Audit with the CAP for the NEMT policy.

If you have any questions regarding this information, please contact your Operational Support Team representative.

Sincerely,



Dave Richard

# DMA NEMT Tracking Spreadsheet

(Effective 9/2017)

Quarter	County	Number of Cases reviewed	Number of Cases with Errors	Description of Errors	Training/Instructions Provided	DMA Recommendations
						N/A