



January 21, 2022

VIA ELECTRONIC MAIL

Kristin Sousa  
Acting Medicaid Program Director  
**RI EOHHS**  
3 West Road, Virks Building  
Cranston, RI 02920  
[kristin.sousa@ohhs.ri.gov](mailto:kristin.sousa@ohhs.ri.gov)

Re: EOHHS Notification of Liquidated Damages, Audit Review Materials and Corrective Actions

Dear Director Sousa:

This letter is in response to your memorandum directed to me dated January 6, 2022. As stated within the memorandum, Medical Transportation Management, Inc. ("MTM") was directed to comply as follows: (a) submit responses to all follow up questions and stated material findings of non-compliance by EOHHS no later than 4:00 PM EST January 21, 2022; (b) complete in-person wheelchair and stretcher securement training to all network providers by March 18, 2022; and (c) implement stated corrective actions and provide written documentation no later than January 14, 2022. MTM's response to each can be found below:

**a. Audit Materials Review**

Please find attached to this letter, responses to EOHHS's follow-up questions and stated material findings, including additional data and documents.

**b. In-Person Wheelchair and Stretcher Securement**

From December 6 through December 17, 2021, MTM conducted in-person wheelchair securement refresher training with all transportation providers with credentialed wheelchair-accessible vehicles. To enhance MTM's securement training process, MTM will require video recordings displaying all drivers' comprehension of appropriate wheelchair securement. The video recordings will serve as attestations of training completion and will be maintained as part of MTM's driver credentialing record. This recording and attestation will be complete by March 18, 2022.

**c. Corrective Action**

In response to the corrective action plan, MTM has implemented stated corrective actions, and submitted written CAP documentation as required on January 14, 2022<sup>1</sup>.

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<sup>1</sup> The CAP response, and accompanying documentation was emailed from Paul Hynes, MTM Rhode Island Program Director to EOHHS on January 14, 2022.



Throughout MTM's 27-year history, our oversight and monitoring practices have been effective and resulted in safe transportation for millions of trips per year. However, to prevent an incident of this nature going forward, MTM has increased our oversight and monitoring activities of the network in Rhode Island. Specifically, we are: i) physically auditing driver licenses at pickup and drop-off locations to ensure drivers are credentialed; ii) retraining the network on proper wheelchair securement; and iii) further scrutinizing our drug and alcohol preventative measures.

As I have stated previously, MTM's number one priority is to ensure the safety of every Rhode Islander transported by MTM's contracted transportation providers. MTM continues to review this incident, and with full reservation and without waiver of MTM's rights, looks forward to continued dialogue with you and your team. As always, thank you for your consideration.

Respectfully,

A handwritten signature in blue ink that reads "Alaina Macia".

Alaina Macia  
CEO, MTM, Inc.

## Follow Up Item 1

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*On January 6, 2022, EOHHS wrote, “EOHHS requests that MTM provide original source material (i.e., photocopies of licenses and copies of insurance) from credentialing.”*

**MTM Response:**

Included with this response are the requested original source material from credentialing.

## Follow Up Item 2

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*On January 6, 2022, EOHHS wrote, “MTM to provide standard operating procedure for checking criminal records and on-going checks for transportation providers for credentialed drivers.”*

**MTM Response:**

MTM’s Credentialing procedures (included below) explain how MTM checks criminal records and conducts on-going checks for both transportation providers and their credentialed drivers.

**Supporting Documents:**

- **Appendix B: Procedure 5001.010 – Credentialing & Re-Credentialing Process**
- **Appendix C: Procedure 5001.020 – Credentialing Requirements – Contracted Transportation Providers**
- **Appendix E: Procedure 5001.040 – Credentialing: Sanction Checks**

## Material Finding 3

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*On January 6, 2022, EOHHS wrote, “MTM must provide EOHHS the cadence in which MTM reviews provider credentials and to comply with annual review process that all drivers are fully credentialed and authorized to operate vehicles.”*

### **MTM Response:**

Before a provider or driver is authorized to perform services under the agreement with MTM, they are required to present credentials outlined in the MTM TPSA – Appendix B. As credentials are received, MTM’s Credentialing staff receives notification(s) prompting a review. Using MTM’s online platform, transportation providers may see the status of their credentials, including reasons for any rejections. Upon receipt and approval of all required credentials, the provider / driver is approved to perform services.

Transportation providers have the option to receive up to four (4) notifications from the online platform prior to the expiration date of each credential. If the credential expires without update, the corresponding transportation provider and/or driver is no longer authorized to perform services until the updated credential is received.

### **Supporting Documents:**

- **Appendix A: Policy 5001 – Credentialing Overview**
- **Appendix B: Procedure 5001.010 – Credentialing & Re-Credentialing Process**

## Material Finding 4

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*On January 6, 2022, EOHHS wrote, “As required in element 3 of deliverable of the Provider Handbook and current Agreement, inconsistencies with vehicle identification do not appear to be enforced or followed by MTM for transportation providers based on documentation submission.”*

### **MTM Response:**

The MTM standard inspection sheet lists 81 individual items/data points that require to be inspected by MTM staff. These items fall into 2 categories:

- **Category 1:** Those that are crucial to safe operation of the vehicle
- **Category 2:** Those that need the attention of the transportation provider but do not immediately prevent the safe operation of the vehicle.

Providers are allotted an allowance of up to and including five (5) fails from Category 2 before a vehicle inspection is listed as a failure. Any fails from Category 1 will result in an immediate failure of the vehicle. The items referenced by EOHHS, including interior signage, are considered Category 2 items.

Any failure by Category 2 items do not absolve the provider from their responsibility of addressing the issue; however, it does allow them time to continue to operate their vehicle while the issues are addressed. MTM’s process is intended to ensure proper network adequacy is maintained without interruption.

### **Supporting Documents:**

- **Appendix F: Procedure 101.026 – Provider Audit and Vehicle Inspection**
- **Appendix G: MTM Vehicle Inspection Sheet**

## Material Finding 5

*On January 6, 2022, EOHHS wrote, “MTM to demonstrate how hand notes are inputted into central database and review process for when documentation expires and is updated. Training materials for how staff review documentation.”*

### MTM Response:

The image below displays an overview of a transportation provider’s credentials stored in MTM’s online database. In the image provided, the user has clicked on the transportation provider’s vehicle’s tab. The vehicles are displayed with their current status. Clicking a vehicle VIN will direct the user to information specific to the vehicle, including required credentials.

The screenshot shows the MTM Logistics Team interface. The account is for Teallia LLC. The 'Vehicles' tab is selected, displaying a table of vehicles. The table has columns for Status, Requires Action, Year, Make, Model, VIN, Type, and Actions. All vehicles listed are 'Approved'.

STATUS	REQUIRES ACTION	YEAR	MAKE	MODEL	VIN	TYPE	ACTIONS
Approved		2017	Toyota	Sienna	STDZ23DC3H5850880	Paralift	edit
Approved		2015	Honda	Accord	1HGCR2F83FA190764	Cab	edit
Approved		2014	Toyota	Sienna	STDZK3DC7E5474569	Cab	edit
Approved		2014	Toyota	Sienna	STDKX3DC7E5429343	Paralift	edit
Approved		2014	Toyota	Sienna	STDKX3DC1E5437468	Cab	edit
Approved		2017	Toyota	Sienna	STDK23DC2H5866733	Paralift	edit

The image below is displayed when a user clicks the vehicle's VIN. This page contains information directly relating to the vehicle, including the vehicle's credential status. For vehicles, MTM requires a vehicle inspection and a copy of the vehicle's registration. The credential status is displayed on the far left (see image below). Status would be "Approved", "Rejected", "Submitted", "Waived", "Pending Approval"

Vehicle  
1HGCR2F83FA190764

Vehicle Details | Related | Details

### Manage Credentials - Vehicle Detail

Honda Accord - Active

Vehicle Details

VIN	Year	Make	Model	License State	License Plate Number
1HGCR2F83FA190764	2015	Honda	Accord	RI	7001
Vehicle Type	Passenger Capacity	Fleet Number	Wheelchair Accessible	Vehicle Ownership	
Cab	4		No	Owned	

Required Credentials

Rhode Island EOHHS

APPROVED | CONTRACTED

2 CREDENTIALS | DRIVER STATUS | VEHICLE STATUS

Search: Search Text

Status: All | Expires Within: All

STATUS	MASTER CREDENTIAL	DEADLINE	BEGIN EFFECTIVE DATE	END EFFECTIVE DATE	ACTIONS
Approved	Vehicle Inspection	07/11/2019	06/29/2021	06/25/2022	
Approved	Vehicle License Registration	07/11/2019	07/28/2020	07/31/2022	

Showing 1 to 2 of 2 rows | 10 records per page

If the user selects an individual credential, they will see the total history of the selected credential. In example displayed below, the user clicked on the vehicle inspection credential and can review the total history of vehicle inspections performed on this vehicle. In this example, the vehicle was inspected three (3) times by MTM in the course of its service.

The screenshot displays a web application interface for 'MTM Logistics Team'. At the top, there is a navigation menu with options like Home, Leads, Accounts, Contacts, Vehicles, Cases, Opportunities, Rejected Credentials, Reports, Dashboards, Contracts, Tasks, and Calendar. A search bar is also present. The main content area shows 'Credential Requirement Status CRS-23785395'. Below this, the 'Credential Details' section is active, showing 'Vehicle Inspection Honda Accord (1HGCR2F83FA190764)'. A note states 'Why this credential is required... The results of the vehicle inspection must be submitted.' A 'Plan' dropdown menu is set to 'CO - Rhode Island State EOHHS/Rhode Island EOHHS'. Below this, a list of inspection records is shown:

Status	Date	Attachment
APPROVED CURRENT	Approved on 06/29/2021	7001.jpg
APPROVED	Approved on 07/20/2020	7001.pdf
EXPIRED	Expired on 07/12/2020	Veh Inspec - 90764.pdf

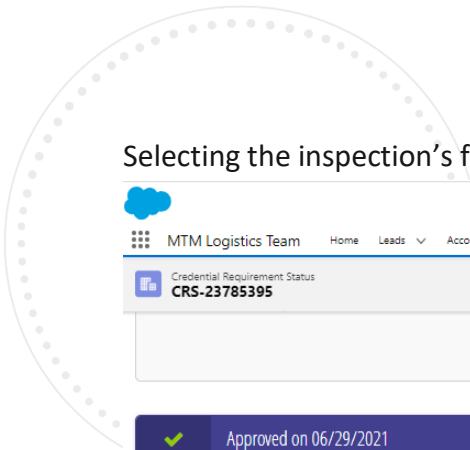


Selecting an individual inspection will prompt a drop down menu that displays the history related to the selected inspection.

The screenshot displays the MTM Logistics Team software interface. At the top, there is a navigation menu with options like Home, Leads, Accounts, Contacts, Vehicles, Cases, Opportunities, Rejected Credentials, Reports, Dashboards, Contracts, Tasks, and Calendar. A search bar is also present. Below the navigation, the main content area shows the 'Credential Requirement Status' for 'CRS-23785395'. A dropdown menu is open, showing a selection of 'CU - Rhode Island State EUMHS/Rhode Island EUMHS'. Below this, there is a section for 'Approved on 06/29/2021' with a 'CURRENT' status. This section includes a table with columns for Status, Deadline, Begin Effective Date, and End Effective Date. Below this, there is a 'Vehicle Inspection' section with columns for Expiration Date, Inspection Date, Visit Type, and Inspection Result. At the bottom, there is a 'STATUS HISTORY (3)' section with a table showing the history of status changes.

STATUS	DATE	USERNAME	NOTES
✓ Approved	06/29/2021	Nicole Stelzer	
○ Submitted	06/25/2021	Darion Stubbs	
○ New	06/25/2021	Darion Stubbs	

Selecting the inspection's file name will prompt a window displaying the uploaded inspection form.



MTM Logistics Team | Home | Leads | Accounts | Contacts | Vehicles | Cases | Opportunities | Rejected Credentials | Reports | Dashboards | Contracts | Tasks | Calendar

Credential Requirement Status  
CRS-23785395

CO - Rhode Island State EUMHS/Rhode Island EUMHS

Selecting a plan will update all credential instances below

Approved on 06/29/2021

7001.jpg

Status	Deadline	Begin Effective Date	End Effective Date
Approved	07/11/2019	06/29/2021	06/25/2022

Vehicle Inspection

Expiration Date	Inspection Date	Visit Type	Inspection Result
06/25/2022	06/25/2021	Vehicle was inspected by MTM directly	Pass

STATUS HISTORY (3)

STATUS	DATE	USERNAME	NOTES
Approved	06/29/2021	Nicole Stelzer	
Submitted	06/25/2021	Darion Stubbs	
New	06/25/2021	Darion Stubbs	

Clicking the “gears” icon on the right side of the page (highlighted yellow) will allow the user to submit a new inspection. An MTM user will scan and upload the hand-written inspection sheets. The inspection sheets are converted to PDF and stored in the vehicle’s account a minimum of ten (10) years, in accordance with contractual requirements.

The screenshot displays the MTM Logistics Team software interface. At the top, there is a navigation menu with options like Home, Leads, Accounts, Contacts, Vehicles, Cases, Opportunities, Rejected Credentials, Reports, Dashboards, Contracts, Tasks, and Calendar. A search bar is also present. The main content area is titled "Manage Credentials - Vehicle Detail" and shows details for a "Honda Accord - Active" vehicle with VIN 1HGCR2F83FA190764. A yellow gear icon is highlighted on the right side of the vehicle details section. Below this, the "Required Credentials" section is visible, showing a table of credentials for "Rhode Island EOHHS".

STATUS	MASTER CREDENTIAL	DEADLINE	BEGIN EFFECTIVE DATE	END EFFECTIVE DATE	ACTIONS
Approved	Vehicle Inspection	07/11/2019	06/29/2021	06/25/2022	
Approved	Vehicle License Registration	07/11/2019	07/28/2020	07/31/2022	

The handwritten Vehicle Inspection Sheet is available for user review (displayed below).

The screenshot displays a web application interface. On the left, a 'Credential Requirement Status' page for 'CRS-23785395' is visible, showing 'Approved on 06/29/2021' and 'Expired on 07/12/2020'. The main area shows a photo viewer for 'Photos - 7001 (2).jpg'. The photo is a handwritten 'Vehicle Inspection Sheet' for a Honda Accord. The sheet includes a checklist of 81 items, with handwritten checkmarks and dates. The photo viewer also shows a sidebar with file thumbnails for '7001.jpg', '7001.pdf', and 'Veh Inspec - 90764.pdf'.

Item #	Item Description	Approved	Service Notes
1	Inspection Date	6/29/21	
2	Inspection Provider	MTM	
3	Year/Make/Model	2015 Honda Accord	
4	VIN	7001	
5	License Plate #	7001	
6	Inspection Date	7/21/22	
7	Notes		
8	State/Regulatory Authority Inspection Date		
9	State/Regulatory Authority #		
10	Vehicle Color		
11	Capacity		
12	MAX GVW		
13	Classification		
14	Classification		
15	Exterior Activity	Approved	Service Notes
16	Body*	✓	
17	Exterior Rearview Mirrors*	✓	
18	Brake Lights*	✓	
19	Head Lights*	✓	
20	Reverse Lights*	✓	
21	Turn Signals*	✓	
22	Braking Behavior*	✓	
23	Tire Condition*	✓	
24	Open Tires & caps*	✓	
25	Mechanical Condition*	✓	
26	Wipers Operation*	✓	
27	Seat Belts*	Approved	Service Notes
28	Seat Belt Extensions	✓	
29	Seat Belt Catches	✓	
30	How Good it is installed	✓	
31	Operable Speedometer/ Odometer	✓	
32	Speed Sensor Pathways OK	✓	
33	Speed Acc No	✓	
34	Measured PPA Error/gather	✓	
35	Emergency Triangle Reflectors	✓	
36	Interior Lights	✓	
37	Interior Rear View Mirror*	✓	
38	Visibility Condition*	✓	
39	Open Windows	✓	
40	Operable Windows*	✓	
41	Operable A/C / Heat / Ventilation*	✓	
42	Open Electrical Items	✓	
43	Operable Electrical	✓	
44	Use Computer (if applicable)	Approved	Service Notes
45	12V Battery or Cellular Phone	Approved	Service Notes
46	Current Vehicle Registration*	✓	
47	Valid Insurance ID Card*	✓	
48	Inspection Recipient Name	✓	
49	Make or RPM Applications	✓	
50	Exterior Damage	✓	
51	Exterior Damage	✓	
52	Exterior Damage	✓	
53	Exterior Damage	✓	
54	Exterior Damage	✓	
55	Exterior Damage	✓	
56	Exterior Damage	✓	
57	Exterior Damage	✓	
58	Exterior Damage	✓	
59	Exterior Damage	✓	
60	Exterior Damage	✓	
61	Exterior Damage	✓	
62	Exterior Damage	✓	
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64	Exterior Damage	✓	
65	Exterior Damage	✓	
66	Exterior Damage	✓	
67	Exterior Damage	✓	
68	Exterior Damage	✓	
69	Exterior Damage	✓	
70	Exterior Damage	✓	
71	Exterior Damage	✓	
72	Exterior Damage	✓	
73	Exterior Damage	✓	
74	Exterior Damage	✓	
75	Exterior Damage	✓	
76	Exterior Damage	✓	
77	Exterior Damage	✓	
78	Exterior Damage	✓	
79	Exterior Damage	✓	
80	Exterior Damage	✓	
81	Exterior Damage	✓	

Using the screen displayed below, MTM staff may submit a completed inspection. Required fields include the following:

- i. Expiration Date -
- ii. Inspection Date
- iii. Visit Type
- iv. Inspection Result

The screenshot shows a web form titled "Submit Credential" with a close button (X) in the top right corner. Below the title is a document icon and the text "Vehicle Inspection". A note states: "The results of the vehicle inspection must be submitted." The form contains four required fields, each marked with a red asterisk: "Expiration Date" (text input with a calendar icon), "Inspection Date" (text input with a calendar icon), "Visit Type" (dropdown menu with "Select" as the current option), and "Inspection Result" (dropdown menu with "Select" as the current option). Below these fields is a "Document Upload" section with a document icon, the text "Please upload a copy of the vehicle inspection.", a blue button labeled "Choose File to Upload...", and a note: "Accepted file types are JPG, JPEG, GIF, PNG, PDF, DOC, DOCX, XLS, XLSX, no larger than 25 MBs in size." At the bottom of the form are two buttons: "Cancel" (grey) and "Save" (light blue).

When a file is uploaded, the credential status changes to “Submitted” (highlighted below). An MTM Credentialing team member will review the vehicle inspection sheet and either approve or reject the credential. Prior to approval, MTM verifies the inspection was passed but also verifies the inclusion of the vehicle in the company’s auto insurance policy.

The screenshot displays the 'Manage Credentials - Vehicle Detail' page for a Toyota Sienna. The vehicle details include VIN 5TDZZ3DC3HS850880, Year 2017, Make Toyota, Model Sienna, License State RI, and License Plate Number 7414. The required credentials table shows two entries: one 'Submitted' for 'Vehicle Inspection' with a deadline of 06/17/2021, and one 'Approved' for 'Vehicle License Registration' with a deadline of 06/17/2021 and an end effective date of 07/31/2022.

STATUS	MASTER CREDENTIAL	DEADLINE	BEGIN EFFECTIVE DATE	END EFFECTIVE DATE	ACTIONS
Submitted	Vehicle Inspection	06/17/2021			
Approved	Vehicle License Registration	06/17/2021	06/17/2021	07/31/2022	

## Material Finding 6 (CAP Item 2) \*

*On January 6, 2022, EOHHS wrote, “MTM must ensure that all documentation submitted from transportation providers is only for those who are driving members during NEMT trips to prevent unauthorized drivers to using the credentials of credentialed drivers. Such safeguards are not established within MTM Handbook and how MTM will provide monitoring and oversight to prevent such occurrences and corrective action by MTM.”*

**MTM Response:** MTM’s TPSA clearly states the requirement that TPs assign trips only to fully credentialed and authorized drivers:

*Transportation Providers shall only use Drivers and vehicles to perform services under this Agreement that are approved and fully credentialed pursuant to the requirements of the Client Contracts. MTM may not pay Transportation Provider for Trips provided by Transportation Provider’s unapproved Drivers, and MTM may not pay Transportation Provider for Trips using unapproved vehicles (MTM TPSA 2:N).*

MTM’s TP Handbook defines clear expectations related to required credentials and encourages TPs to contact their MTM Representative for any additional needed guidance. Further, where a claim is submitted with an uncredentialed driver, MTM has controls in place to ensure that the claim is rejected and not paid.

To bolster the safeguards in place currently, MTM implemented in-person field audits to help identify areas of non-compliance including, but not limited to, preventing TPs’ use of unauthorized drivers. On a monthly basis, MTM will audit 10% of all approved drivers through use of on-site visits, field observations, and transportation ride-alongs. Audit targets will be determined through a combination of randomized site visits and use of MTM’s Fraud, Waste, and Abuse reporting to identify potential instances where TPs may be utilizing unverified or inadequately licensed drivers, and require additional investigation from MTM. The randomized audit encourages continuous compliance as TPs are unaware of when an audit will occur.

The following events are grounds for a failed field audit:

- Failure to produce a valid driver’s license and/or Hackney License;
- Inability of the MTM Field Representative to match the driver’s license picture to the driver present;
- Positive identification of the driver that is unapproved due to denied or expired credential(s); and/or

- Any observed unsafe driving conditions, as identified and reported by the MTM Field Representative.

In the event of a failed audit:

- The MTM Field Representative will immediately contact the Rhode Island Program Director to inform of the failure, and the Program Director will inform EOHHS of the failure within one (1) business day of identification.
- The member's transportation will be assigned to a different TP.
- The TP will be placed in a suspended status, effective immediately, and all of its remaining trips for the day will be re-assigned.
- The Program Director may submit a termination request to MTM's Legal Department, and the TP may be terminated where legally and contractually appropriate.

MTM will submit audit results to EOHHS by the 15th of each month via FTP for the preceding month's audits. Reporting will include electronic copies of completed Driver Audit Sheets and a reporting summary that presents overall results, inclusive of the number of inspections performed and total number of drivers registered with MTM.

\* MTM submitted the preceding response for the EOHHS CAP response on January 14, 2022.

**Supporting Documents:**

- **Appendix H: Procedure 102.004 On Site Driver Audits**



## Follow Up Item 7

*On January 6, 2022, EOHHS wrote, “MTM to provide documentation that all transportation provider completed substance free driving education given findings from police report. No such documentation is included in submission.”*

### **MTM Response:**

**(1) The following language is contained in our standard Transportation Provider Services Agreement, signed by all contracted Rhode Island providers.**

3.G “Drivers and Attendants must not use alcohol or drugs or be under the influence of alcohol or drugs at any time while providing MTM transportation services. Any Driver taking prescribed and/or over the counter (OTC) medication which may hinder his/her performance must report such use to his/her supervisor, and not transport Members. A Driver or Attendant may use properly prescribed medication as long as his/her duties can still be performed in a safe manner and Transportation Provider has written medical documentation from his or her medical provider that the medication will not impact the ability of the Driver.”

5.F “If a reasonable suspicion exists that a Driver or Attendant is under the influence of alcohol or drugs, the Transportation Provider must immediately remove its Driver or Attendant from service under this Agreement and submit him or her to an alcohol and/or Drug Screening at the Transportation Provider’s expense”

5.G “Transportation Providers must maintain a Substance Free Workplace Policy to include but not be limited to pre-employment and random drug and alcohol screening for Drivers and Attendants pursuant to drug and alcohol testing regulations for safety sensitive positions. A copy of the policy must be provided to MTM upon request. Refusal to submit to testing within the designated time frame is considered a positive test result and will have disciplinary consequences. Drivers or Attendants testing positive for drugs and/or alcohol will no longer be permitted to transport Members. Drivers and Attendants must not have

- i) Received treatment for a drug, alcohol, narcotics or prescription medication addiction, or abuse within the past five (5) years.
- ii) Received a positive drug screening resulting from a urine analysis or other drug screening within the past five (5) years.

**Copies of all signed transportation provider service agreements have been previously provided during the initial audit submission.**

The screenshot shows the Rhode Island EOHHS system interface. At the top, there are navigation tabs for 'APPROVED' and 'CONTRACTED'. On the right, there are status indicators for 'COMPANY CREDENTIALS' (16), 'DIVER STATUS' (4), and 'VEHICLE STATUS' (3). Below the navigation is a search bar and filters for 'Status' and 'Expires Within', both set to 'All'. The main table has columns for STATUS, MASTER CREDENTIAL, DEADLINE, BEGIN EFFECTIVE DATE, END EFFECTIVE DATE, and ACTIONS. The 'Reasonable Suspicion Training' entry is highlighted in yellow.

STATUS	MASTER CREDENTIAL	DEADLINE	BEGIN EFFECTIVE DATE	END EFFECTIVE DATE	ACTIONS
Approved	Public Utility Commission (PUC) Certificate	12/13/2018	01/22/2019		
Approved	Company Drug Free Workplace Policy	03/01/2019	12/28/2018		
Approved	Appendix A (BAA)	03/01/2019	09/24/2021		
Approved	Section 2KK Amendment	10/31/2020	10/02/2020		
Approved	TPSA	11/17/2021	09/24/2021		
Approved	EOHHS 1st Amendment - RI	11/17/2021	09/24/2021		
Approved	Reasonable Suspicion Training	01/31/2022	12/27/2021		

Showing 11 to 17 of 17 rows | 10 records per page

**(2) Training: The following trainings and credentials are required to be undertaken by our contracted transportation providers. An example of the stored credential(s) is displayed above.**

**A. Reasonable Suspicion:**

- a. Training provided by National Rural Transit Assistance Program.
- b. Reasonable Suspicion Training for Supervisors
- c. Reasonable Suspicion training is for supervisors who are in charge of making reasonable suspicion referrals of safety-sensitive employees.
- d. To be authorized to make referrals, the FTA requires:
  - i. 60 minutes of training on the physical, behavioral, and performance indicators of probable drug use.
  - ii. 60 minutes of training on the physical, behavioral, and performance indicators of probable alcohol misuse.

**B. Drug Free Workplace Policy:** All contracted transportation providers are required to submit their company’s policy on drug use. Company owners must sign and date the sheet. This is a required credential and must be approved prior to authorization as an available transportation provider.

## Material Finding 8 (CAP Item 1) \*

*On January 6, 2022, EOHHS wrote, “Initial incident report did not have sufficient details on the nature of the incident that would allow EOHHS to request MTM to peruse immediate actions. Specifically, an uncredentialed driver was driving a NEMT trip and was under the influence of alcohol. MTM to provide notification process, specifically how transportation providers are to report the occurrence of criminal activity. Request process for timely updates on the status of an injured member.”*

**MTM Response:** As part of the TPSA, MTM requires TPs to give immediate notice to MTM of any criminal investigations, charges or proceedings against TPs or their drivers. In addition, TPs are required to notify MTM of other incidents and accidents within twenty-four (24) hours of the occurrence. To ensure understanding of this requirement, drivers are required to receive MTM’s Assisting Passengers and Emergency Situation Training. The training is part of each driver’s required credentials, and MTM must have documented evidence of the training completion before a driver is authorized to perform trips for RI Medicaid or ETP members.

A TP’s failure to adhere to the reporting requirement could be subject to the following consequences:

- 1st offense: Suspension of the TP until the accident/incident closure is completed by MTM
- 2nd offense: Termination of the TP’s contract with MTM

Where applicable, MTM may independently verify the accuracy of TP-reported incidents/accidents through use of police and accident reports. Copies of said police reports are made available to the client upon request.

To promote understanding and adherence, MTM recently communicated refresher training to the entire Rhode Island TP network regarding incident / accident reporting process expectations.

MTM maintains a documented procedure to ensure that critical incidents, such as emergencies and accidents, are escalated appropriately and efficiently. MTM employees receive training on this process, and resource documents are available for employee reference as needed. To identify any missed critical incidents, MTM utilizes CallMiner software to capture and monitor for “risky calls.” MTM’s Quality Assurance Analytics team built a custom syntax to identify calls with areas of potential risk, allowing staff to ensure that appropriate follow up actions take place.

The above activities will continue, with increased scrutiny to the timeliness of all required notifications, both from TPs and to EOHHS.

\* MTM submitted the preceding response for the EOHHS CAP response on January 14, 2022.

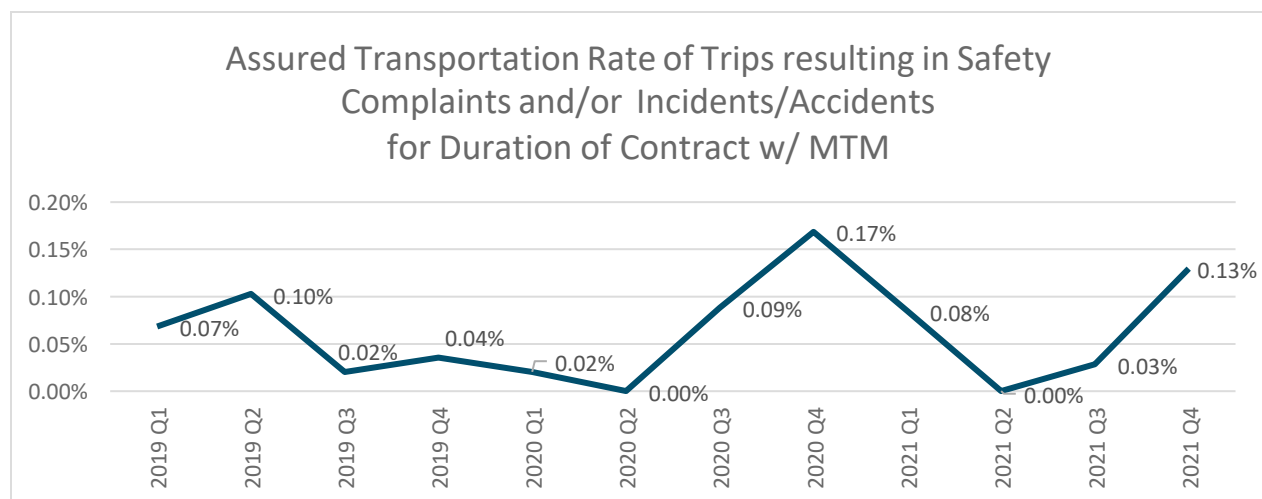
**Supporting Documents:**

- **Appendix I: First State of Rhode Island and Providence Plantations (EOHHS) TPSA Agreement**
- **Appendix J: TPSA – Appendix B – Credentials – RI**
- **Appendix L: MTM Assisting Passenger and Emergency Situation Training (Slides 19 – 26)**
- **Appendix N: Procedure 201.003 – Emergency Situations**
- **Appendix P: Procedure 7003.002 – Complaint Log Process**

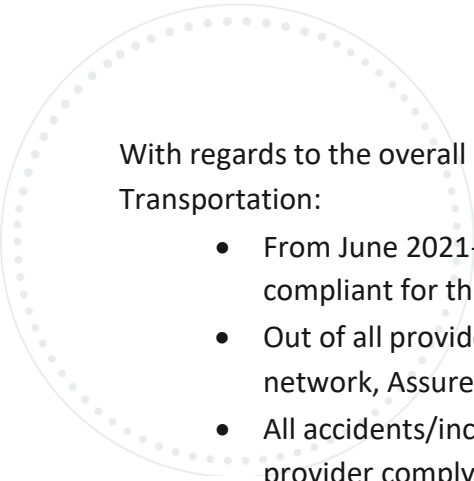
## Follow Up Item 9

*On January 6, 2022, EOHHS wrote, “MTM to provide EOHHS written response to why Assured Transportation was not terminated from its network for previous complaints and incidents. MTM to provide documentation if they were aware that Assured Transportation had been reported to be using unauthorized drivers within its provider network.”*

MTM has provided NEMT services for 27 years, and, during that time, gained a great deal of experience managing our global transportation provider network. MTM developed well-established processes surrounding complaints, incidents, and accidents management, and our clients nation-wide maintain confidence in our ability to monitor and address these items. Based on this experience, MTM’s adherence to the established processes was adequate to ensure we prevented this type of outcome.



MTM would take further action when a TP’s rate of trips resulting in safety-related complaints and/or incidents/accidents exceeds 0.5% for three (3) consecutive months. The number of incidents and/or registered complaints associated with Assured Transportation did not exceed the aforementioned standard, and thus the provider was not previously terminated due to complaints and/or incidents.



With regards to the overall percentage of complaints and/or incidents related to Assured Transportation:

- From June 2021-November 2021, Assured Transportation did not register non-compliant for their complaint percentage.
- Out of all providers performing service in MTM's Rhode Island transportation network, Assured Transportation ranked 15th for complaints in 2021.
- All accidents/incidents occurring with Assured Transportation resulted in the provider complying with MTM follow up training requirements.
- At no time was MTM aware an unauthorized driver was operating with Assured Transportation.

**Supporting Documents:**

- **Appendix O: Policy 7003 – Complaints Management**
- **Appendix P: Procedure 7003.002 – Complaint Log Process – RI**
- **Appendix Q: Policy 7005 – Reporting and Handling of Accidents/Incidents**
- **Appendix: R: Procedure 7005.008 – Reporting and Handling of Accidents/Incidents - RI**

## Material Finding 10

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*On January 6, 2022, EOHHS wrote, “Submission did not establish the thresholds which transportation providers would be terminated from the network for repeated offenses.”*

### **MTM Response:**

MTM may temporarily suspend transportation providers (TP) for reasons included but not limited to:

- Driver Issues
- Vehicle Issues
- Insurance Issues
- Continued poor performance or other non-compliance issues

The TP suspension will continue until the reason(s) for suspension are resolved. They are closely monitored to ensure they remain compliant with MTM’s requirements. A request for termination may be initiated without cause or for cause. The request must undergo review and approval by MTM’s Legal Department. All correspondence and applicable documentation shall be maintained in the TP’s file.

### **Supporting Documents:**

- **Appendix S: Procedure 101.001**
- **Appendix T: Procedure 101.004**

## Material Finding 11 \*

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*On January 6, 2022, EOHHS wrote, “MTM did not provide any materials to describe improved quality control to prevent uncredentialed drivers from operating an NEMT trip for Rhode Island members. Such safety findings have been documented in EOHHS Oversight meetings with MTM, however, documentation does not reflect how MTM is preventing such actions and illicit activities for subcontracted transportation providers. Safeguards need to be implemented immediately.”*

### **MTM Response:**

MTM’s TPSA clearly states the requirement that TPs assign trips only to fully credentialed and authorized drivers:

*Transportation Providers shall only use Drivers and vehicles to perform services under this Agreement that are approved and fully credentialed pursuant to the requirements of the Client Contracts. MTM may not pay Transportation Provider for Trips provided by Transportation Provider’s unapproved Drivers, and MTM may not pay Transportation Provider for Trips using unapproved vehicles (MTM TPSA 2:N).*

MTM’s TP Handbook defines clear expectations related to required credentials and encourages TPs to contact their MTM Representative for any additional needed guidance. Further, where a claim is submitted with an uncredentialed driver, MTM has controls in place to ensure that the claim is rejected and not paid.

To bolster the safeguards in place currently, MTM implemented in-person field audits to help identify areas of non-compliance including, but not limited to, preventing TPs’ use of unauthorized drivers. On a monthly basis, MTM will audit 10% of all approved drivers through use of on-site visits, field observations, and transportation ride-alongs. Audit targets will be determined through a combination of randomized site visits and use of MTM’s Fraud, Waste, and Abuse reporting to identify potential instances where TPs may be utilizing unverified or inadequately licensed drivers, and require additional investigation from MTM. The randomized audit encourages continuous compliance as TPs are unaware of when an audit will occur.





The following events are grounds for a failed field audit:

- Failure to produce a valid driver's license and/or Hackney License;
- Inability of the MTM Field Representative to match the driver's license picture to the driver present;
- Positive identification of the driver that is unapproved due to denied or expired credential(s); and/or
- Any observed unsafe driving conditions, as identified and reported by the MTM Field Representative.

In the event of a failed audit:

- The MTM Field Representative will immediately contact the Rhode Island Program Director to inform of the failure, and the Program Director will inform EOHHS of the failure within one (1) business day of identification.
- The member's transportation will be assigned to a different TP.
- The TP will be placed in a suspended status, effective immediately, and all of its remaining trips for the day will be re-assigned.
- The Program Director may submit a termination request to MTM's Legal Department, and the TP may be terminated where legally and contractually appropriate.

MTM will submit audit results to EOHHS by the 15th of each month via FTP for the preceding month's audits. Reporting will include electronic copies of completed Driver Audit Sheets and a reporting summary that presents overall results, inclusive of the number of inspections performed and total number of drivers registered with MTM.

\* MTM submitted the preceding response for the EOHHS CAP response on January 14, 2022.

**Supporting Document:**

- **Appendix H: Procedure 102.004 On Site Driver Audits**

## Follow Up Item 12

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*On January 6, 2022, EOHHS wrote, “MTM to provide data how price paid for negotiated rate does not decrease quality for transportation.”*

### MTM Response:

### Analysis of Relationship of Provider Quality vs Rates 1/15/22

Approach: Using 2021 data, compared different metrics of Provider quality vs. Provider rate structure.

Metrics:

1. Provider Turnbacks per 100 trips
2. Provider No Shows per 100 trips
3. Complaints per 100 trips
4. Accidents/Incidents

Rates: Using 2021 scheduled rates, calculated cost per trip for a 7 miles trip (state average). Analysis was done using both the absolute cost per trip as well as classifying rates as low, medium (average), high or very high.

Ambulatory providers categorized as very high cost ranged from \$22.00-\$24.50 (4 providers)

Ambulatory providers categorized as high cost ranged from \$20.50-21.50 (14 providers)

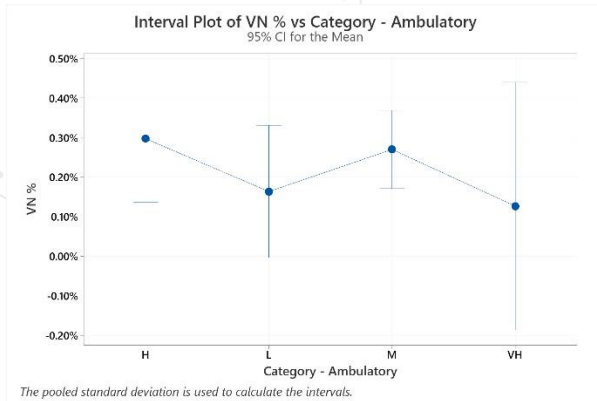
Ambulatory providers categorized as medium cost ranged from \$19.50-20.00 (40 providers)

Ambulatory providers categorized as low cost ranged from \$14.90 – 19.00 (11 providers)

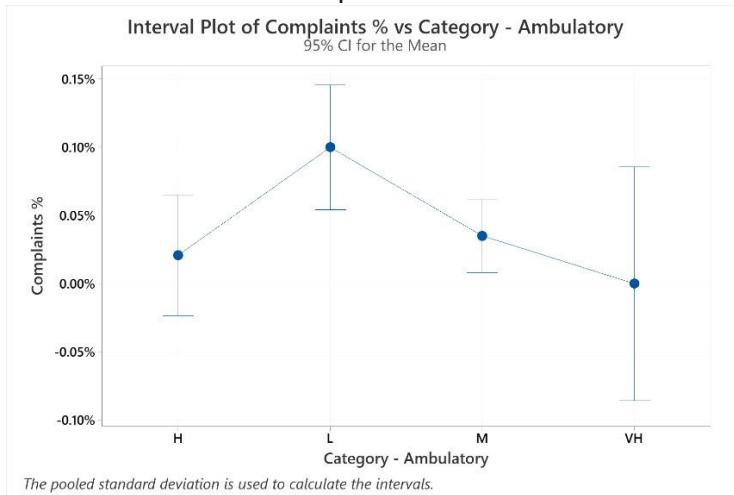
Conclusion: There is no statistical difference in any of the quality indicators listed above for higher or lower cost providers; therefore, provider rate does not appear to be an accurate predictor of the quality of service the provider offers. Also of note, Assured Transportation was not one of MTM’s lower cost transportation providers, further indicating that negotiated rate does not necessarily predict the quality of transportation.

Analytical Outputs:

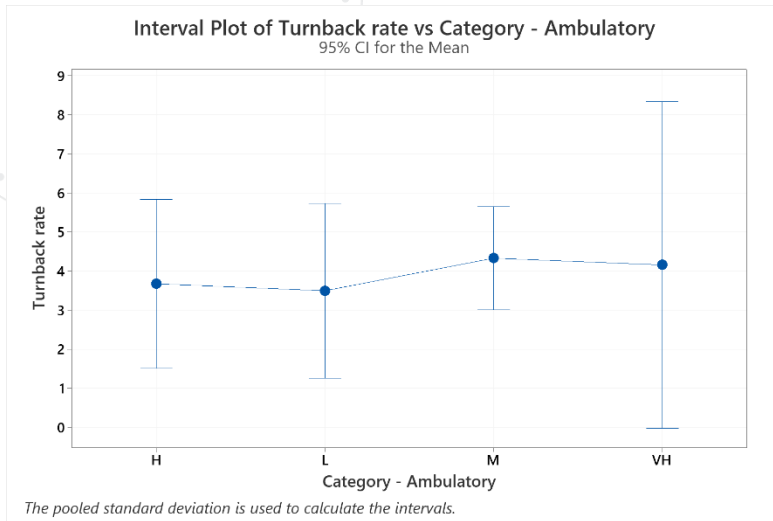
There is no difference between provider no show rates based on rate



Looking at complaints, the lowest cost provider did have a higher average complaint rate; however, it was not statistically significantly different and higher cost providers did not perform better than medium cost providers.

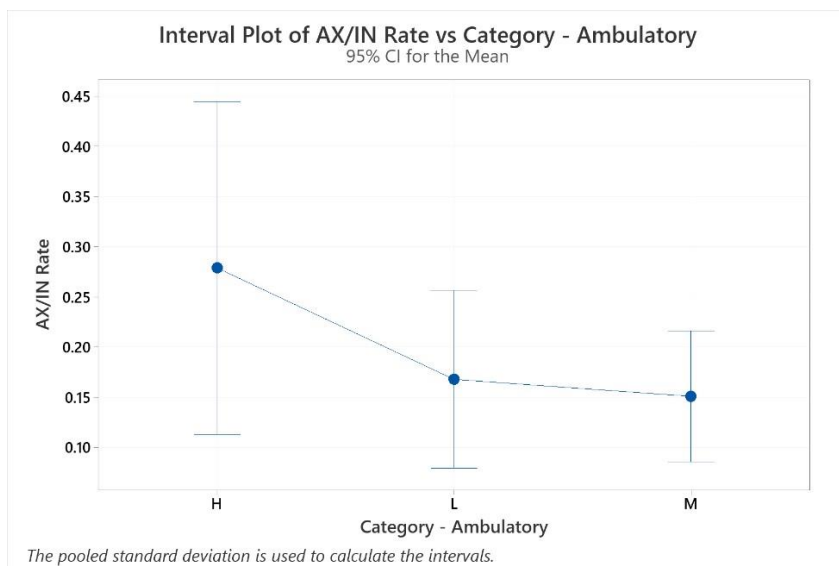


Turnback rates were also no different by provider cost



Accidents/Incidents:

Looking at providers who had accidents or incidents in 2021, there was no significant difference between the higher and lower cost providers. (no very high cost providers had accidents – very high cost providers account for fewer than 5% of total trips)



## Follow Up Item 13

*On January 6, 2022, EOHHS wrote, “MTM to provide EOHHS additional information on how rates are negotiated and how MTM ensures that quality transportation providers are retained in its network.”*

### **MTM Response:**

Initial transportation provider (TP) rates were negotiated in a collective setting with the now-disbanded Rhode Island NEMT association, which comprised the vast majority of MTM’s TP Network at the time of implementation. The rates were determined at arm’s length and considered factors such as mode and geography. MTM continues to negotiate each individual TP’s rate at arm’s length. The proposed rate takes into consideration the mode, TP’s geographic location, and the TP’s service area. MTM may alter the proposed rate to meet network adequacy needs.

Since contract inception, only one TP (Aero Airport Limousine Service) left the MTM TP Network specifically citing rates paid. The TP’s business partnership with MTM ceased pre-pandemic and was the result of NEMT not fitting in with the provider’s existing business model. The TP’s business subsequently dissolved due to the COVID-19 pandemic.

MTM remains a committed business partner to our valued TP Network members. MTM incentivizes quality transportation by offering high-performing TPs the first opportunities for growth and expansion by increasing revenue through trip volume and facility partnerships. Included below is the RI EOHHS Contract Language calling for MTM’s use of most cost-effective options:

- “Medically necessary services must be provided in the most cost effective and medically necessary setting and shall not be provided solely for the convenience of the recipient, caretaker, or service provider” (page 10).
- “The Broker shall implement a centrally-managed human service transportation system that provides consumers with access to high-quality non- emergency medical transportation services by using the most cost-effective and Medically necessary delivery mode available” (page 15).
- “The Broker shall ensure call center staff are able to assign trips for all populations, verify recipients' eligibility, and determine least costly mode of transportation based on medical necessity” (page 22).
- “The Broker shall establish a network to ensure that recipients in the community are well served, including developing a competitive marketplace that has a variety of TPs for each mode of transportation” (page 22).

- “The Broker will provide annual reports submitted to EOHHS by July 1 of each year that forecasts, monitors, and controls the overall costs of transportation service delivery by assigning trips to the lowest cost, most medically necessary mode available” (page 24).

## Material Finding 14

*On January 6, 2022, EOHHS wrote, “EOHHS did not receive the intended response details describing the in state MTM staff % of work assignment within the RI program. EOHHS has noted that some key personnel staff have changed their job titles as of 12/1/2021 that would reflect that their scope was larger than just servicing the Rhode Island account which is contractually required.”*

### MTM Response:

The chart displayed below includes the contractually required positions, along with names and locations of the Full Time Equivalent (FTE) employees assigned to the required positions. The total number of FTE employees exceeds MTM’s contract requirements.

Position Title	Contract FTE	Current	Name Fulfilled	Location
General Manager	1	1	Paul Hynes	Rhode Island
Chief Information Officer	1	1	Rick Holbrook	Remote
Call Center Operations Manager	1	1	Sara Harrison	Rhode Island
Utilization Review Manager	1	1	Stacy Whittington	Remote
Quality Assurance Manager	0.5	0.5	Tammy Wright	Remote
Transportation Provider Relations Manager	1	0.5	Katie Callahan	Rhode Island
Complaints Manager	0.5	0.5	Chris Jenkins	Remote
Education and Training Manager	0.5	0.5	Nicole Redd	Remote
Contact Center Supervisor	1	1	Lisa Boze	Remote

Position Title	Contract FTE	Current	Name Fulfilled	Location
Customer Care Representative	23	21	21 Rhode Island Based CCRs (4/21 positions currently open and recruiting); 146 total CCRs skilled and available for Rhode Island calls.	Dual
Support Representative	6	6	39 Total Escalation Supervisors available for Rhode Island	Remote
Verification Specialist	0.5	0.5	Chris Kolkmeier	Remote
Helpdesk Analyst	0.5	0.5	Tammy Torres	Remote
Provider Management Representative	1	2.5	Rick Zuckerman, Darion Stubbs, Lucy Silva	Rhode Island
Quality Investigation Specialist	1	1	Samantha Conn	Rhode Island
Recipient Advocate/Ombudsman	1	1	Nicole Forsee	Rhode Island
Facility Outreach Trainer	1	1	Joseph Carvalho	Rhode Island
Rhode Island Dispatcher	0	2	Kristin Sweet, Halie Carter (Eff 12/21)	Remote
<b>Total</b>	<b>41.5</b>	<b>42.5</b>		

MTM would like to reference the following language on Page 15 of our contract which calls for MTM to enhance program efficiency: “The Broker shall provide opportunities and incentives to improve overall cost effectiveness and program efficiency.”

As most programs develop, the needs of the program change from first inception. MTM reinvests any savings generated from responsibility sharing to better focus on the needs of the program. For Rhode Island, MTM identified a need for additional vendor account managers and dedicated Rhode Island dispatchers to better manage the transportation network and added 3.5 additional full time equivalent employees to these roles.

## Wheelchair Training

*On January 6, 2022, EOHHS wrote, “EOHHS is requiring MTM to conduct in-person training for securing wheelchairs and stretchers for all network providers by March 18, 2022. MTM must require all credentialed network transportation providers, including those who have completed a wheelchair training course during the last twelve (12) months, to take an in-person class and final examination, including demonstration on how to secure wheelchairs and stretchers, that meets industry safety standards. Due to the pandemic, classes are being conducted virtually, however, given the importance to ensure individuals are securely placed in vehicles, in-person hands on training of transportation providers must be required by MTM. MTM will be responsible for producing in-person training attendance logs for individuals for credentialed TPs. EOHHS shall have access to review training materials and attend in-person training classes. EOHHS will evaluate the quality of MTM’s training and that review that all approved transportation providers have participated in all required trainings and passed the final examination-demonstration successfully. Any MTM network transportation provider who does not complete the in-person training by March 18, 2022 shall not be permitted to transport wheelchair or stretcher NEMT members.”*

### **MTM Response:**

MTM’s Transportation Provider Service Agreement (TPSA) – Appendix B requires drivers to receive Passenger Assistance, including Wheelchair Securement training prior to being authorized to perform services under the agreement. MTM collects a written attestation to serve as evidence of the training completion, and it is available in the driver’s credentialing records on MTM’s online database.

Between December 6 and December 17, 2021, MTM conducted in-person wheelchair securement refresher training with all TPs with credentialed wheelchair-accessible vehicles. The training was conducted using the TPs’ equipment and a wheelchair provided by MTM, and it covered equipment requirements, onboarding and unloading passengers, and the four-point wheelchair securement system. TP owners signed an attestation upon completion of the training, which was added to the credentials maintained in MTM’s online database.

To enhance MTM’s securement training process, we will obtain video recordings displaying the drivers’ comprehension of appropriate wheelchair securement. The video recordings will serve as attestations of training completion and will be maintained on MTM’s online database alongside other required driver credentials.





**Supporting Documents:**

- **Appendix I: TPSA – Appendix B – Credentials - RI**
- **Appendix D: Procedure 5001.022 Credentialing Requirements – Contracted Transportation Providers (Appendix B)**
- **Appendix K: MTM Assisting Passengers (Wheelchair Securement) Training**
- **Appendix M: MTM Wheelchair Accessible Vehicle (WAV) Refresher Training**



## Appendix A

### Corporate Policy

<b>Subject:</b>	Credentialing Overview		
<b>Policy No.:</b>	5001	<b>Created Date:</b>	5/2/2016
<b>Authorized By:</b>	President/CEO	<b>Review Date:</b>	4/26/2021
<b>Department:</b>	Quality Operations	<b>Approval Date:</b>	7/21/2021

**PURPOSE:** To ensure MTM approves and rejects submitted credentials in a timely manner to ensure compliance.

**POLICY:** All submitted credentials will be reviewed and either approved or rejected within contractually required timeframes.

All credentialing review and processing is conducted by MTM staff and is not sub-delegated to another entity.

All credentials will be processed in accordance with MTM and client requirement. MTM credentialing staff will process each credential based on those requirements and in a non-discriminatory manner. Credential approval/denial is conducted in compliance with credentialing requirements as outlined within the contract preventing the possibility of discrimination.

**RESPONSIBILITY:**

Required documents, also known as credentials, will be submitted by various stakeholders to meet contract requirements.

1. The Credentialing Team will review submitted documentation for accuracy and validity.
2. After review, a credential will either be approved or rejected.
3. Stakeholders will not be considered "Approved" until all required credentials have been approved by the Credentialing team.

This policy is reviewed on an annual basis for appropriateness and effectiveness.

***MTM Proprietary Document***

*Policy No: 5001 - Credentialing Overview*



## Appendix B

### Corporate Procedure

<b>Subject:</b>	Credentialing & Re-credentialing Process		
<b>Procedure No:</b>	5001.010	<b>Created Date:</b>	9/6/2013
<b>Authorized By:</b>	Director, Quality Operations	<b>Review Date:</b>	4/26/2021
<b>Department:</b>	Quality Operations	<b>Effective Date:</b>	7/21/2021

**PURPOSE:** The purpose of the procedure is to outline the review process for credentials on the Credentialing application website. The Credentialing application website is an online tool created to help transportation providers and MTM manage credentialing information electronically. MTM monitors compliance for all transportation providers through the Credentialing application website.

**POLICY:** Policy 5001- Credentialing Overview

**RESPONSIBILITY:**

1. Transportation providers are required to submit all credentials using the Credentialing application website.
  - A. When a transportation provider submits a credential, they must provide all supporting documentation and enter required data for the specific credential.
2. The Credentialing staff will be notified of the need to review and verify submitted credentials.
  - A. The Credentialing staff must review and verify if credentials meet all applicable contractual obligations/expectations.
  - B. If there are any questions or concerns about a submitted credential, Credentialing staff will reach out to MTM's Legal Department for their input and will make a decision as to whether or not the credential should be approved based on their feedback.
  - C. When the credential is verified and approved, the results are available to view by the transportation provider online.
  - D. If a credential is not valid or does not meet all applicable contractual obligations/expectations, the Credentialing staff rejects the credential and adds a note listing the rejection reason.
  - E. An automatic message/notifications are an available option to the transportation provider regarding the rejection.
  - F. The transportation provider can view the rejection reason notes and resubmit a corrected and/or appropriate credential for review.

**MTM Proprietary Document**

*Procedure No: 5001.010 Credentialing & Re-credentialing Process*

*Page 1 of 2*

3. If all required credentials are complete, accurate, and verified by MTM, the transportation provider, driver/attendant, and/or vehicle will be approved for use.
  - A. The transportation provider can view the real-time approval status of the provider, drivers/attendants, and/or vehicles online.
4. Transportation providers have the option to receive up to four periodic notifications from the Credentialing application website prior to the expiration date of each credential.
  - A. If the transportation provider does not act upon these notifications, the currently approved credential remains valid until the expiration date.
5. Transportation providers, drivers/attendants, and vehicles will continue to go through the credentialing and/or the re-credentialing process as individual credentials continue to expire and are resubmitted for review and approval.

This procedure is reviewed on an annual basis for appropriateness and effectiveness.



## Appendix C

### Corporate Procedure

<b>Subject:</b>	Credentialing Requirements: Contracted Transportation Providers		
<b>Procedure No:</b>	5001.020	<b>Created Date:</b>	9/3/2013
<b>Authorized By:</b>	Director, Quality Operations	<b>Review Date:</b>	4/26/2021
<b>Department:</b>	Quality Operations	<b>Effective Date:</b>	7/21/2021

**PURPOSE:** To ensure each transportation provider is provided with a detailed and comprehensive list of expectations and requirements; contracted transportation providers receive the following documents, but may not be limited to the following:

- Transportation Services Agreement (Contract)
- Appendix A (Handbook/BAA)
- Appendix B (Credentialing Guidelines)
- Appendix C (Medicare Advantage/Medicaid Program Addendum)
- Schedule A (rates)
- Schedule B (Liquidated Damages) (*if contractually applicable*)

Transportation Services Agreement (Contract) and Appendix A (Handbook) which contains, but is not limited to, a list of expectations and requirements outlining the scope of work, driver requirements, vehicle requirements, training and personnel policies, compensation, liquidated damages (*if contractually applicable*), insurance, education and training.

Appendix B contains a list of required credentials in order for the transportation provider and its drivers to become approved to contract with MTM. MTM will verify all required credentialing documents before approving transportation providers, drivers, and vehicles. Providers will be notified any time MTM approves a company, driver, or vehicle.

Appendix C contains a list of requirements for the Medicare Advantage/Medicaid Program Addendum. The requirements include, but are not limited to, compliance, privacy, confidentiality, audits, records, payments, accountability, delegated activities, policies and procedures.

The Centers for Medicare and Medicaid Services ("CMS") and associated laws, rules and regulations regarding the Medicare Advantage ("MA") and Medicaid Program require that managed care organizations provide compliance documentation to contracted network providers, their respective employees and contracted individuals and entities participating within certain MA and Medicaid Programs.

#### **MTM Proprietary Document**

Procedure No: 5001.020 Credentialing Requirements: Contracted Transportation Providers

Page 1 of 2

Scheduled A contains mutually agreed upon rates MTM pays to the transportation provider and/or drivers for their services.

Scheduled B contains a list of financial damages the transportation provider and/or drivers will be assessed in the event they do not meet certain contractual requirements.

**POLICY:** Policy 5001- Credentialing Overview

**RESPONSIBILITY:**

Each transportation provider is provided with a Transportation Services Agreement (contract) Appendix A (Handbook/BAA), Appendix B, Appendix C, Schedule A and Schedule B which explains MTM expectations and requirements.

1. The Transportation Provider must agree to, sign (where applicable) and return the Transportation Services Agreement, Schedule A and Schedule B back to MTM for countersigning (where applicable).
2. MTM will then review the documents, countersign (where applicable), and upload a copy of each document into the MTM Credentialing application website for the transportation provider's records. All documents will be verified by MTM prior to approving transportation providers, drivers, and vehicles. MTM will notify providers if any of the documents do not meet our compliance standards.
3. Documents related to contracting and credentialing of transportation providers are stored electronically within the MTM Credentialing application website.
4. MTM retains the right to amend any/all of the contractual documents upon written notice to the transportation provider in order to maintain consistency and/or compliance with any state or federal law, policy, directive, contractual requirement, or government sponsored program requirements.
5. If the transportation provider does not deliver to MTM written notice of rejection of the amendment within ten (10) days of the date of the notice of the amendment, the amendment shall be deemed accepted and shall be binding upon the transportation provider.
6. The parties agree that if any terms of the contractual documents are in conflict with any state or federal laws or regulations, such conflicted terms of these documents shall be deemed waived and unenforceable.

This procedure is reviewed on an annual basis for appropriateness and effectiveness.

***MTM Proprietary Document***

*Procedure No: 5001.020 Credentialing Requirements: Contracted Transportation Providers*

***Page 2 of 2***



# Appendix D

## Corporate Procedure

<b>Subject:</b>	Credentialing Requirements: Contracted Transportation Providers (Appendix B)		
<b>Procedure No:</b>	5001.022	<b>Created Date:</b>	10/17/2019
<b>Authorized By:</b>	Director, Quality Operations	<b>Review Date:</b>	4/26/2021
<b>Department:</b>	Credentialing	<b>Effective Date:</b>	7/21/2021

**PURPOSE:** To ensure each Appendix B to the Transportation Provider Service Agreement, is accurate, detailed and a comprehensive list of expectations and requirements per MTM's Client (Plan) and/State Agreements.

Appendix B contains a list of required credentials in order for the Transportation Provider and its drivers to become approved to contract with MTM. MTM will verify all required credentialing documents before approving transportation providers, drivers, and vehicles. Providers will be notified any time MTM approves a company, driver, or vehicle.

**POLICY:** Policy 5001- Credentialing Overview

**RESPONSIBILITY:**

Contract Compliance and Credentialing Operations will be responsible for working together and ensuring Appendix Bis created with clear expectations and requirements for credentialing pertaining to MTM's Client (Plan) and/State Agreements and will archive justification.

Contract Compliance and Credentialing Operations will agree and approve each Appendix B prior to distribution to Transportation Providers.

Contract Compliance and Credentialing Operations will ensure each approved Appendix Bis represented properly within MTM's document depository.

**NEW MTM's Client (Plan) and/State Agreements** - Contract Compliance will review RFP or Awarded Contract with Credentialing Operations to ensure credentialing requirements. Once reviewed, agreed and approved, Credentialing Operations will update MTM's document depository with new MTM's Client (Plan) and/State Agreements required credentials.

**Amended MTM's Client (Plan) and/State Agreements** - Contract Compliance will review amended Contract with Credentialing Operations to ensure of any amended credentialing requirements. Once reviewed, agreed and approved, Credentialing Operations will update MTM's document depository with amended MTM's Client (Plan) and/State Agreements required credentials.

This procedure is reviewed on an annual basis for appropriateness and effectiveness.

**MTM Proprietary Document**

*Procedure No: 5001.022 Credentialing Requirements: Contracted Transportation Providers (Appendix B)*



## Appendix E

### Corporate Procedure

<b>Subject:</b>	Credentialing: Sanction Checks		
<b>Procedure No:</b>	5001.040	<b>Created Date:</b>	2/20/2014
<b>Authorized By:</b>	Director, Quality Operations	<b>Review Date:</b>	10/28/2021
<b>Department:</b>	Quality Operations	<b>Effective Date:</b>	10/28/2021

**PURPOSE:** To maintain oversight and ensure compliance of transportation providers, their owners/officers, person with controlling interest, drivers, personnel, and attendants/aides, etc. by screening a third-party database for potential prohibitive sanctions listed by, but may not be limited to the following entities:

- System for Award Management (SAM)
- Office of Inspector General (OIG)
- U.S. Treasury and Blocked Persons & Office of Foreign Assets Control (OFAC)
- Office of Personnel Management (OPM)

Per the Centers for Medicare & Medicaid Services (CMS) Managed Care Manual Chapter 21, sanction checks are required every 30 days (or more often if required by MTM) for approval of transportation providers and personnel prior to providing transportation services. The transportation provider and personnel are monitored through the Sanction Check Website ([www.sanctioncheck.com](http://www.sanctioncheck.com))

**POLICY:** Policy 5001 Credentialing Overview

**RESPONSIBILITY:**

1. Sanction checks will be performed for each transportation provider, owners/officers, drivers, and attendants/aides prior to the entity's initial approval and every 30 days thereafter. These checks include all published state Medicaid exclusion lists and CMS exclusion lists.
2. Information maintained for each owner/officer, person with controlling interest, driver, attendant/aide will include, but may not be limited to first name, last name, date of birth, driver's license number (if applicable), and vendor code.
3. Information maintained for each transportation provider will include, but may not be limited to the transportation provider company name, vendor code, state, and federal tax ID number.
4. All sanction check results will be saved to MTM's credentialing files.
5. After a full review has been completed and if the company or any personnel are found to be a match, the company or personnel will be immediately deactivated until the entity or person is cleared. This process will be completed according to contractual agreements and matches will be forwarded to the client per contract requirements.

This procedure is reviewed on an annual basis for appropriateness and effectiveness.

**MTM Proprietary Document**

*Procedure No: 5001.040 Credentialing: Sanction Checks*

*Page 2 of 2*





## Appendix F

### Corporate Procedure

<b>Subject:</b>	Provider Audit and Vehicle Inspection		
<b>Procedure No:</b>	101.026	<b>Created Date:</b>	9/6/2013
<b>Authorized By:</b>	Director, Provider Network	<b>Review Date:</b>	4/26/2021
<b>Department:</b>	Network Management	<b>Effective Date:</b>	7/21/2021

**PURPOSE:** To ensure each transportation provider is fully audited by the Provider Network staff annually to confirm full compliance with all of MTM's contractual requirements and other obligations.

**POLICY:** Policy 101 Transportation Provider Contracting

#### RESPONSIBILITY

1. Transportation provider audit (via on-site, desk-top, or virtual) and vehicle inspections (via on-site, or virtual) forms are completed annually to conduct a full review of all credentialing items submitted by the transportation provider.
2. When a Transportation Provider Audit is performed, the Provider Network staff will set up a meeting at the provider's facility to review the credentialing items. Both parties (MTM and the transportation provider) review and agree to the results/terms/conditions of the audit form and both parties are required to sign/date the form.
3. Provider Network staff will perform a vehicle Inspection (via on-site, or virtual) on every vehicle that will be providing service for MTM. Transportation providers are required to provide a copy of a valid vehicle license registration for each vehicle they intend to utilize while providing services to MTM.
4. Once considered satisfactory/approved (based on contractual requirements) by the Provider Network staff, the vehicle Inspection will be retained within the Credentialing application website. Both the vehicle Inspection and vehicle registration must be in an approved status prior to vehicle being utilized and/or approved.
5. Transportation providers are required to submit renewed documentation for all renewable items prior to their individual expiration dates on the Credentialing application website.
6. Transportation providers cannot use a vehicle which has not been approved or has reached the expiration date on its registration and/or approval by MTM.
7. When a Transportation Provider Audit is performed by a Provider Network staff; they will review the credentialing items (Appendix B) on the Credentialing application website. If fully compliant, the Provider Network staff will sign/date the form.
8. If there are deficiencies, the transportation provider will receive a notification on which

#### **MTM Proprietary Document**

Procedure No: 101.026 Provider Audit and Vehicle Inspection

Page 3 of 2

deficiencies to review and correct. Once all deficiencies have been corrected, the transportation provider will notify the Provider Network staff and an additional audit will be performed for final review to ensure the corrections have been made.

9. A final copy of the audit form (once fully approved) is placed on the Credentialing application website.
10. The process repeats annually unless an event warrants the Provider Network staff to perform an ad-hoc audit immediately to satisfy the concern of the client.

**NOTE:** MTM will verify all documentation before approving transportation providers, drivers and vehicles

This procedure is reviewed on an annual basis for appropriateness and effectiveness.



Appendix G: Vehicle Inspection Sheet

Revised July 2020

1	Inspection Date:		8	State/Regulatory Authority Inspection Date:	
2	Transportation Provider:		9	State/Regulatory Authority #:	
3	Year/Make/Model:		10	Vehicle Color:	
4	VIN:		11	Capacity:	
5	License Plate #:		12	W/C Lift Type:	
6	License Expiration Date:		13	Lift Location:	
7	Fleet #:		14	Odometer:	
<b>Exterior Safety</b>		<b>Approved</b>	<b>Service Notes</b>		
15	Horn*		52	Exterior Company Placard (both sides) *	
16	2 Exterior Rearview Mirrors*		53	Interior Company Placard / MTM Contact Info	
17	Brake Lights*		54	"No Smoking / Eating / Drinking"	
18	Headlights*		55	"All Passengers Must Wear Seatbelts"	
19	Hazard Lights*		<b>Structural</b>		<b>Approved</b>
20	Reverse Lights*		56	Wall Panel / Headliner *	
21	Turn Signals*		57	Vehicle Body Integrity*	
22	Parking Brake*		58	Operational Doors*	
23	Tire Condition*		<b>Wheel Chair Vehicle</b>		<b>Approved</b>
24	Spare Tire & Jack*		59	Operable Wheelchair Lift/Ramp*	
25	Windshield Condition*		60	Hand Rails*	
26	Wipers Operational*		61	Lift Controls Inside Vehicle & Secure*	
<b>Interior Safety Equipment</b>		<b>Approved</b>	<b>Service Notes</b>		
27	Seat Belts*		62	Shoulder Restraint*	
28	Seat Belt Extensions		63	Lap Belt*	
29	Seat Belt Cutter		64	4 Floor Straps - Forward Facing Position*	
30	Step Stool (if applicable)		65	Lift/Ramp Lock*	
31	Operable Speedometer/Odometer		66	Parking Brake & Engine Interlock System*	
32	Blood Borne Pathogen Kit		67	Metal / Mesh / Non-skid Plate*	
33	First Aid Kit		68	Emergency Manual Lift*	
34	Mounted Fire Extinguisher		69	Lift Reflector Tape*	
35	3 Emergency Triangle Reflectors		<b>Stretcher</b>		<b>Approved</b>
36	Interior Lights		70	Mattress: non-porous fabric, at least 3" thick*	
37	Interior Rear View Mirror *		71	Restraining straps (chest, hip & knee)*	
38	Upholstery Condition *		72	Restraint for upper torso*	
39	Clean Interior		73	Straps have metal-to-metal quick-release*	
40	Operable Windows*		74	Clean Linen, Blankets, Pillows*	
41	Operable AC / Heat / Ventilation*		75	Exit / Entry Area Clear*	
42	Wiring and Battery underhood		76	Oxygen Tank Retention System*	
43	Extra Electrical Fuses		77	Waterless Antiseptic Hand Wash*	
44	Operable Flashlight		78	Disinfection Supplies / Soiled Linen Bag*	
45	Chains/Traction Device (if applicable)		79	Stretcher Anchorages, Center Mounting*	
46	Ice Scraper (if applicable)				
<b>Communication</b>		<b>Approved</b>	<b>Service Notes</b>		
47	2 Way Radio or Cellular Phone		80	<b>Comments:</b>	
<b>Information Package</b>		<b>Approved</b>	<b>Service Notes</b>		
48	Current Vehicle Registration*		81	<b>Inspection Result: Pass</b>	
49	Valid Insurance ID Card*		82	<b>Inspection Sticker Applied: N/A</b>	
50	Incident /Accident Forms				
51	Maps or GPS Applications		83	<b>Next Inspection Date:</b>	
<p>KEY:            Section with (*) asterisk = Missing or unacceptable condition means vehicle cannot be approved.            Section with no asterisk = Missing more than five, vehicle cannot be approved.            All sections must be filled out. If section does not apply, mark N/A.</p>			<p><b>Type of inspection:</b></p> <p style="text-align: center;">Re-Inspection</p>		<p style="text-align: right;">MTM007424            Inspector Signature</p>
<p>PROPRIETARY AND CONFIDENTIAL PER Gen. Laws, 1956, §38-2-2</p>					



# Appendix H

## Corporate Procedure

<b>Subject:</b>	On-Site Driver Audits		
<b>Procedure No:</b>	102.004	<b>Created Date:</b>	1/12/2022
<b>Authorized By:</b>	Sr. Director, Logistics Operations	<b>Review Date:</b>	[Procedure-Review-Date]
<b>Department:</b>	Logistics	<b>Effective Date:</b>	1/13/2022

**PURPOSE:** On a monthly basis, 10% of all drivers will be audited using on-site visits, field observations and transportation ride along.

**POLICY:** Policy 102 Transportation Provider On-Site Visits

### RESPONSIBILITY:

#### 1. Process for identifying and performing Audit.

MTM staff will be required to perform in person verification of the accuracy on driver and vehicle credentials by performing a field audit, on site visit or ride along of transportation providers during the course of live member transportation.

Audit targets will be determined by a combination of randomized site visits and using MTM's Fraud, Waste and Abuse reporting to identify possible instances where transportation providers may be acting in malfeasance and require MTM staff investigation.

During the course of the audit, Driver's license, Hackney license and vehicle information will be checked and cross referenced with MTM's online credential portal to verify the driver and vehicle is approved and active. The information presented by the driver must match what is recorded in MTM's credentialing system and photo identification must match the physical driver presenting the document.

The following events are grounds for failed audit.

- o Failure to produce a valid driver's license and/or Hackney License
- o The MTM field representative inability to match the picture of the drivers license to the driver present.
- o A positive identification of the driver, however, the driver being unapproved due to any other denied or expired credential.
- o Any observed unsafe driving conditions by the MTM field representative.

### **MTM Proprietary Document**

*Procedure No: 103.004 On Site Driver Audits*

*Page 1 of 2*

## 2. Process for Failed Audit

In the event of a failed audit, field representative will perform the following steps:

1. Field Representative will immediately contact RI program director to inform of the failure.
  - a. Program Director will inform EOHS of failure within one (1) business day of identification.
2. Member's transportation **From** appointment will be reassigned to a different transportation provider.
3. Transportation Provider will be put into a suspended status effective immediately and remaining trips for the day will be rescheduled.
4. Program Director will submit termination request to MTM legal department.

## 3. Client Reporting

Audit results will be submitted to client by 15<sup>th</sup> of the month via FTP for previous month's audit. Results will include completed electronic copies of the MTM Driver Audit Sheet and a monthly cover sheet reporting overall results inclusive of number of inspections performed and total number of drivers registered with MTM.

This procedure is reviewed on an annual basis for appropriateness and effectiveness.

# Appendix I

## First FIRST STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS EXECUTIVE OFFICE OF HEALTH AND HUMAN SERVICES (EOHHS) AMENDMENT TO TRANSPORTATION PROVIDER SERVICES AGREEMENT

**THIS FIRST AMENDMENT** (“First Amendment”) to the Transportation Provider Services Agreement is made and entered into by and between Medical Transportation Management, Inc. (“MTM”) and (“Transportation Provider”). MTM and Transportation Provider may be referred to hereinafter collectively as the “Parties,” and individually, each a “Party.”

**WHEREAS**, the Parties have previously entered into a Transportation Provider Services Agreement (“Agreement”); and

**WHEREAS**, the Parties wish to amend and modify certain terms of the Agreement as stated herein;

**NOW, THEREFORE**, in consideration of the mutual promises and covenants herein, the Parties agree to amend the Agreement as follows:

### **1. DEFINITIONS**

Delete:

D. **Criminal Background Check** and replace with the following:

**Criminal Background Check** shall mean a criminal background check on each driver and attendant through the RI Bureau of Criminal Identification (BCI) or the National Crime Information Center (NCIC) (if not a resident of Rhode Island for at least five (5) consecutive years), prior to employment with the Transportation Provider and annually thereafter. For drivers not residing within the state of Rhode Island, FBI background checks or similar from the driver’s state of residence are also required.

### **2. TRANSPORTATION PROVIDER REQUIREMENTS**

Delete:

B. and replace with the following:

Transportation Provider is a legally recognized business entity duly incorporated or organized, validly existing, authorized to transact business, and in good standing under the laws of the State in which services are being rendered. A Certificate of Good Standing from the Rhode Island Secretary of State must be provided to MTM upon request.

H. and replace with the following:

Transportation Provider understands and agrees that it is the Transportation Provider’s responsibility for itself and its Drivers, to obtain and maintain in active status any and all licenses, permits, certificates, and registrations that are required by Federal, State or local laws, rules and regulations, as they currently exist and may hereafter be amended, including but not limited to any and all licenses, registrations, or certificates required to provide transportation for hire, and to operate as a Medicaid Provider in the assigned Service Area. These may include but not be limited to the Rhode Island Medicaid Provider ID number, the NPI

First FIRST STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
EXECUTIVE OFFICE OF HEALTH AND HUMAN SERVICES (EOHHS)

RI TPSA Amendment 07.06.2021 - Page 8 of 3

(National Provider Identifier Standard) number and the PUC (Public Utilities Commission) license.

M. and replace with the following:

Transportation Provider shall provide its Drivers and Attendants with visible, easily readable identification including a picture ID badge with Driver's name and Transportation Provider's Company name, for security and identification purposes. Transportation Provider shall ensure that all drivers have their PUC identification visible during operation of their vehicle.

#### **5. CREDENTIALING AND RE-CREDENTIALING**

Delete:

B. i) through B. ii) and replace with the following:

- i) Driver training, including Defensive Driving
- ii) Passenger Assistance – transferring, loading, unloading, including Wheelchair Securement
- iii) Cardiopulmonary Resuscitation (CPR)
- iv) First Aid
- v) Cultural Competence
- vi) Participate in a minimum of twelve (12) hours in-service training on related subjects annually, including training on working with special populations such as the disabled and/or elderly

#### **5. CREDENTIALING AND RE-CREDENTIALING**

Delete:

C. iv) and replace with the following:

- iv) Drug & Alcohol Screening Results 1) Pre-employment, 2) Post Accident and upon suspicion, 3) Random per current FTA regulations:  
<http://www.dot.gov/ost/dapc/rates.html> - covering more than twenty-five percent (25%) of the drivers each year shall be mandatory.

Insert:

C. vi) Health Attestation

C. vii) Sexual Offender Registry Checks or the equivalent, from all fifty (50) states

#### **5. CREDENTIALING AND RE-CREDENTIALING**

Delete:

I. and replace with the following:

I. Transportation Provider must not allow its Drivers or Attendants to perform services under this Agreement who are currently on work release, probation, parole, or pending any felony or misdemeanor charge, or arrest, or drug or alcohol related traffic offense charge, which, if the charge were to result in a conviction, would disqualify the Driver, Transportation Provider, or Attendant under this Agreement. Any Transportation Provider's Drivers and Attendants must have no prior convictions for a sexual crime or crime of violence. Any Driver or Attendant that has been

FIRST STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
EXECUTIVE OFFICE OF HEALTH AND HUMAN SERVICES (EOHHS)

RI TPSA Amendment 07.06.2021 - Page 9 of 3

convicted of a felony during the last ten (10) years may drive or aid Members only with the approval of MTM's Client.

**5. CREDENTIALING AND RE-CREDENTIALING**

Insert:

J. v) Revocation or suspension of the Driver's vehicle operator's license within the previous five (5) years for moving traffic violations.

**5. CREDENTIALING AND RE-CREDENTIALING**

Delete:

K. and replace with the following:

K. Any Transportation Provider's Drivers and Attendants must have no prior convictions for substance abuse within the last ten (10) years or within the timeframe prescribed by applicable State law.

**9. INSURANCE**

Amended:

All references to 'Waiver of Subrogation' shall be deleted.

Except as amended herein, all other terms and conditions of the Agreement remain unchanged and in full force and effect.

**IN WITNESS WHEREOF**, the parties have executed this Amendment to be effective as of \_\_\_\_\_,

<b>Medical Transportation Management, Inc.</b>	
By:	By:
Print:	Print:
Title:	Title:
Date:	Federal Tax ID#                      Date:



# Appendix J

## TRANSPORTATION PROVIDER SERVICES AGREEMENT Appendix B

Credentialing information/documentation must include but not limited to the following:

(Please see applicable TPSA Amendment(s) for any additional “Clients” required credentials)

1. **Company Credentials:**

- A. Transportation Provider Service Agreement
- B. Appendix A (Business Associate Agreement)
- C. Appendix B (Credentials)
- D. Appendix C (Medicare Advantage Addendum)
- E. Schedule A (Rate Sheet)
- F. Schedule B (Liquidated Damages)
- G. First First State Of Rhode Island and Providence Plantations (EOHHS) TPSA Amendment
- H. Commercial General Liability Insurance
- I. Commercial Automobile Liability Insurance
- J. Workers Compensation
- K. Federal ID (W-9)
- L. Disclosure of Ownership
- M. PUC License
- N. Substance Free Workplace Policy
- O. Provider Audit
- P. Office of Inspector General (OIG) (MTM internal check)
- Q. System for Award Management (SAM) (MTM internal check)
- R. HIPAA Training
- S. Fraud, Waste and Abuse Training

2. **Driver Credentials:**

- A. Driver’s License(s)
- B. Hackney License
- C. National & State Criminal Background Checks, Pre-employment and annually thereafter
- D. Motor Vehicle Driving Records Report for the previous three (3) years - (Annual)
- E. Drug & Alcohol Screening Results 1) Pre-employment, 2) Post Accident and upon suspicion, 3) Random per current FTA regulations: <http://www.dot.gov/ost/dapc/rates.html>.
- F. Office of Inspector General (OIG) (MTM internal check)
- G. System of Award Management (SAM) (MTM internal check)
- H. Training Certificates
  - 1. Fraud, Waste and Abuse Training
  - 2. HIPAA Training
  - 3. Driver Training, including Defensive Driving
  - 4. Passenger Assistance, including Wheelchair Securement

3. **Attendant Credentials:**

- A. Attendant Identification (valid photo ID)
- B. National & State Criminal Background Checks, Pre-employment and annually thereafter
- C. Drug & Alcohol Screening Results 1) Pre-employment, 2) Post Accident and upon suspicion, 3) Random per current FTA regulations: <http://www.dot.gov/ost/dapc/rates.html>.
- D. Office of Inspector General (OIG) (MTM internal check)
- E. System of Award Management (SAM) (MTM internal check)
- F. Training Certificates
  - 1. Fraud, Waste and Abuse Training
  - 2. HIPAA Training
  - 3. Passenger Assistance, including Wheelchair Securement

4. **Vehicle Credentials**

- A. Vehicle Inspection
- B. Vehicle Registration

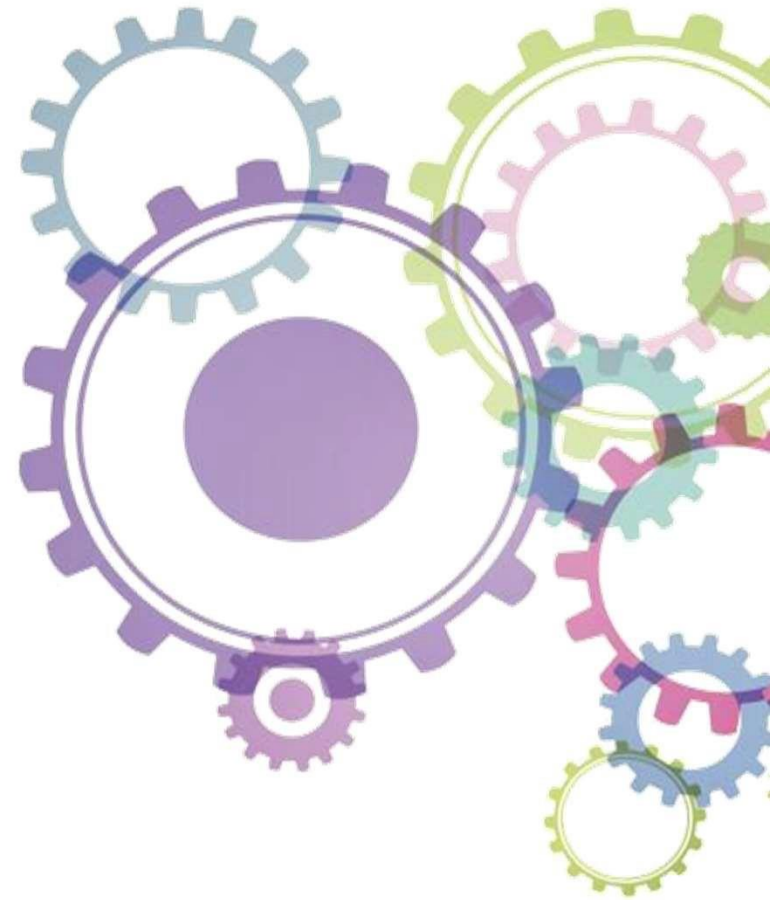
## Appendix K



Assisting Passengers with Disabilities  
and  
Emergency Situation Training

# Overview

- Assisting Passengers with Disabilities
- Emergency Situations





# Assisting Passengers with Disabilities



# ADA and Civil Rights

- “Civil Rights Protection for Over 50 Million Americans”
- ADA: a civil rights law enacted by Congress in 1990
  - Prior to ADA, inaccessible public transit created barriers to active, productive lives for 43 million Americans with disabilities
  - Individuals with disabilities were excluded from the workplace, schools and participating as contributing community members
- ADA gave individuals with disabilities the same opportunities as others

# ADA

- ADA definition of “person with a disability”: individuals with physical/mental impairments that substantially limit one or more major life activities
  - Individuals with a record of such impairment
  - Individuals regarded as having an impairment
- Addresses transportation provided by public entities and private entity systems

# ADA Training Requirements

- Vehicle operators must be trained to:
  - Function vehicles and equipment safely
  - Provide required level of service
  - Treat passengers with disabilities in a respectful and courteous way



# Requirements

- Announce stops on request
- Permit service animals to accompany passengers
- Permit passengers to travel with life support
- Make appropriate use of accessibility-related equipment
- Provide adequate time to board and disembark

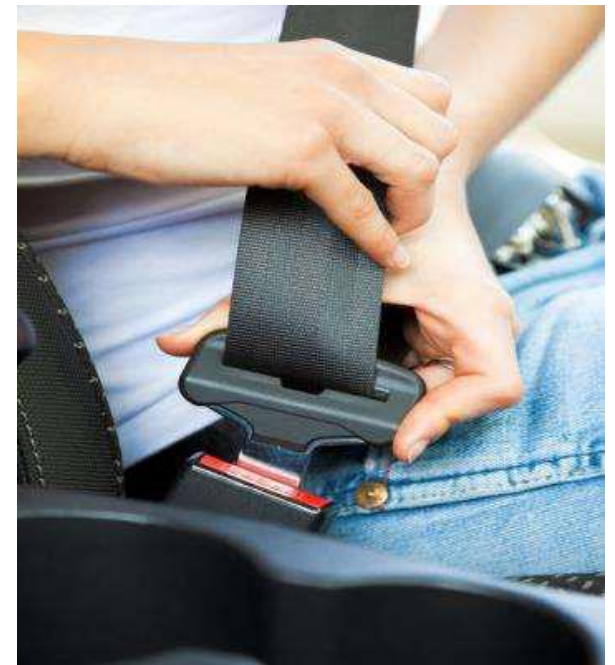


# Requirements

- Drivers may not:
  - Discriminate
  - Deny service if the passenger is capable of using it
  - Require use of designated priority seats
  - Impose special charges based on disability, gender, religion, national origin, race, or age
  - Refuse service solely because the passenger's disability results in behavior that may offend, annoy, or inconvenience
- It is not discrimination to refuse service if the passenger engages in violent, seriously disruptive or illegal conduct

# Assisting Passengers

- Do not touch members except as appropriate and necessary
  - Assistance into and out of the vehicle
  - Helping member into a seat
  - Securing seatbelts
  - Rendering first aid and assistance for which the driver has been trained



# Assisting Passengers



- Exit the vehicle to open and close doors when passengers enter and exit the vehicle
- Provide assistance as necessary to and from the main door of the pick up and drop off destinations

# Assisting Passengers

- Provide adequate support and visual/oral directions
  - Applies to the movement of wheelchairs and mobility-limited members as they enter and exit the vehicle using a wheelchair lift
- Prior to allowing vehicle to proceed, confirm that wheelchairs, cots, and stretchers are properly secured and that all members are properly seat-belted or secured/ restrained in their mobility device

# Assisting Passengers

- Assist members in exiting the vehicle and moving to the building access of the destination



# Assisting Passengers



- Providers cannot deny service on basis of difficulty in securing a wheelchair
- Permit standees to use lift

# Assisting Passengers

- Mobility devices must fit on the lift or ramp and within the “envelope” of securement
- Only the vehicle operator should control the lift





# Assisting Passengers

- Store mobility aids and folding wheelchairs for members
  - Drivers and attendants are not responsible for members' personal items





# Assisting Passengers

- Four-point floor securement system **MUST** be used to secure wheelchairs and other mobility devices
- Each securement location must have a three-point passenger restraint system



# Assisting Passengers

- Transfer from wheelchair to vehicle seat can be recommended but not required
- Assistance in transferring to a seat is required even if driver must leave his/her seat to do so



# Assisting Passengers

- Regular and frequent lift maintenance programs must be developed and instituted
- Report non-operating lifts as soon as possible
  - Every effort must be made to repair lifts before the next day of service

# Closing

*Thank you for your participation!*

Congratulations on completing the MTM Assisting Passengers with Disabilities and Emergency Situation Training Course!





**QUESTIONS?**

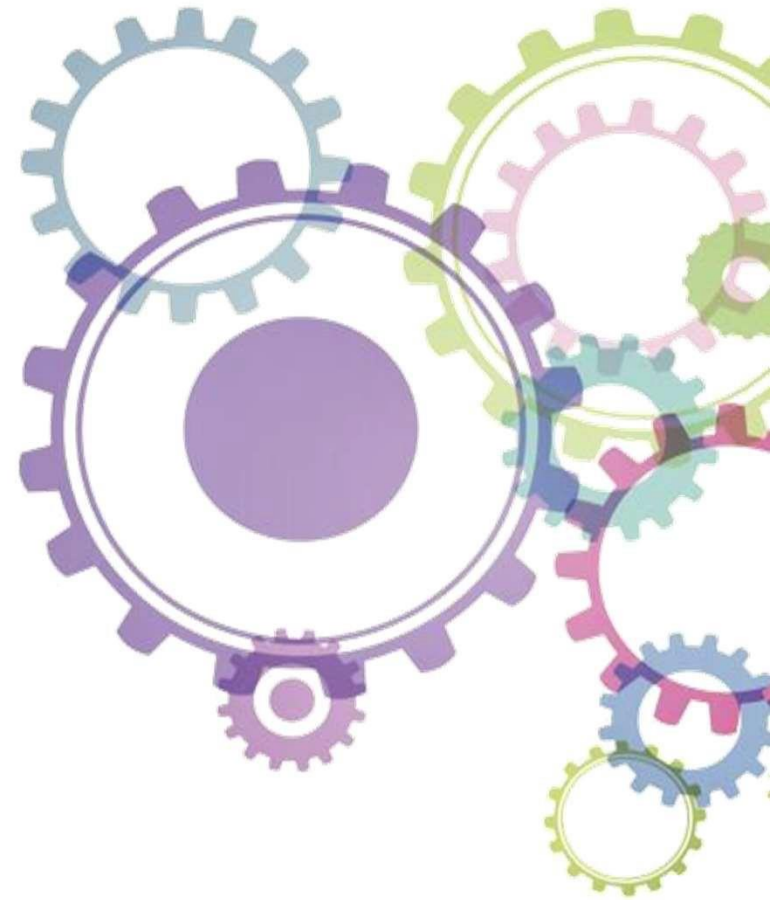
## Appendix L



Assisting Passengers with Disabilities  
and  
Emergency Situation Training

# Overview

- Assisting Passengers with Disabilities
- Emergency Situations





# Emergency Situations



# Responding to an Emergency

- Remain calm
- Provide leadership to passengers
  - Passengers will look to you for help and direction
- Protect yourself, passengers and the vehicle
  - Prevent injury and death to anyone involved in the situation



# In Case of an Emergency

- Natural Disaster
  - Contact your vendor account manager if you cannot take a trip due to a natural disaster (Blizzard, Hurricane, Flooding, etc.)
- Accident
  - If you cannot pick up a member due to an accident, make sure to contact the dispatch office to reroute the trip
  - If you get into an accident with a member in the vehicle
    - Call 911 if needed
    - Call dispatch so they can notify MTM
    - Report it to MTM within 24 hours of event



# In Case of an Emergency

- If a member falls out of a wheelchair or off a lift, contact 911
- Do not touch the member as you potentially could do more damage
- Report to dispatch

# Responding to an Emergency

- Determine what happened and what actions/inactions will protect the safety of people and property
  - Reduce vehicle and other property damage
  - Avoid unnecessary liability claims

# Responding to an Emergency



- Report incidents and accidents immediately or as soon as it is safe to do so
- Notify dispatch and your supervisor of all emergency situations
- Contact emergency services as necessary
  - Dial 911 for immediate assistance

# Reporting Emergency Situations to MTM

- Document the situation
- Use MTM's Incident/Accident Form (Attachment A)
- File a police report if necessary

# Attachment A: Incident/Accident Form

## MEDICAL TRANSPORTATION MANAGEMENT ACCIDENT/INCIDENT REPORT FORM

Accident and incident reports must be submitted to MTM in writing by the end of the following business day; injury reports must be made verbally to MTM within three hours of the occurrence.

**DATE OF ACCIDENT/INCIDENT:** \_\_\_\_\_

### **PARTICIPANT(MEMBER/RECIPIENT/BENEFICIARY) INFORMATION**

Name of Primary Person(s) Involved: \_\_\_\_\_

Medicaid/ID # (if applicable): \_\_\_\_\_

Trip Number: \_\_\_\_\_

Health Plan: \_\_\_\_\_

Age: \_\_\_\_\_ Phone #: \_\_\_\_\_

Residential Address: \_\_\_\_\_

### **LOCATION OF ACCIDENT/INCIDENT**

Address (if different from above): \_\_\_\_\_

Transportation Provider Name: \_\_\_\_\_ Phone: \_\_\_\_\_

Driver Name: \_\_\_\_\_



# Closing

*Thank you for your participation!*

Congratulations on completing the MTM Assisting Passengers with Disabilities and Emergency Situation Training Course!







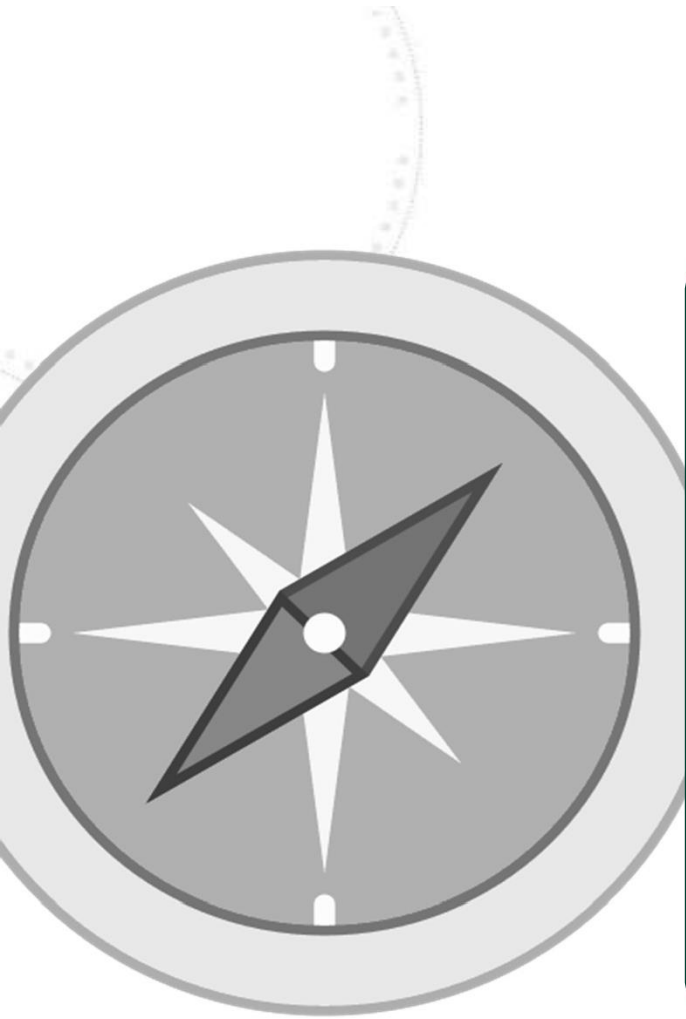
**QUESTIONS?**

## Appendix M

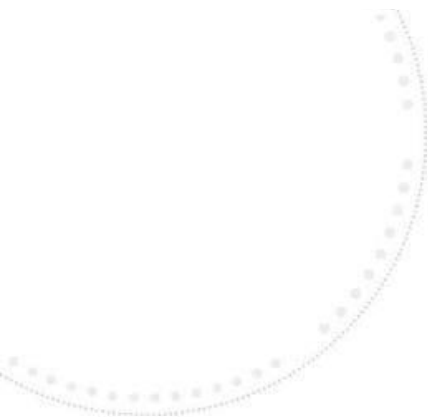


### Wheelchair Accessible Vehicle (WAV) Refresher

# Course Objectives



- After completing this training, you will understand:
  - Customer Service
  - Vehicle Types
  - Ramp Operations
  - Securing the Passenger and their Wheelchair
  - Hands on



# Customer Service



# Passenger Assistance and Safety

- A passenger should never have to ask for assistance because the driver failed to offer it
- When unsure, ask questions like “What is the best place to attach the securements to your wheelchair?”
- Explain each step and ask questions as you going along:
  - “I’m lowering the ramp now”
  - “I am attaching the straps to your chair”
  - “Are you comfortable?”
- Don’t take short cuts, it’s not a race
- Drive at a MODERATE speed, you have a wheelchair on board



# Dignity and Respect

- Greet the passenger at first contact
- Use a friendly tone of voice, make eye contact, and smile
- Talk to the passenger instead of the attendant
- Passenger will refer you to attendant if they're having trouble communicating
- Crouch down so you are at eye level with passenger
- Keep back of your hand facing passenger when routing belts
- Unnecessary leaning on or touching the chair is similar to leaning on or touching the person



# When Addressing Passengers

- Avoid phrases like:

- Handicapped
- Wheelchair bound
- Deaf and Dumb
- Retarded
- Afflicted
- Confined to a wheelchair
- Normal
- Poor
- Suffering
- Unfortunate
- Victim

- Use phrases such as:

- Person with a disability
- Wheelchair user
- Person who has a hearing loss
- Mobility Device

*Remember to address the person  
and not the disability*

*Think PEOPLE FIRST!*



# What Vehicle Do You Have?





# Safe Boarding Practices

- Choose safest loading areas, such as:
  - Accessible parking spaces or loading zones
  - Protected parking, not in a traffic lane
  - Before a crosswalk with clearance for the wheelchair to travel on the curb side of the vehicle
- Use 4-way flashers
- Make sure your vehicle is in park
- Use caution when exiting the vehicle & watch for oncoming traffic
- Follow the same safety tips at the end of the trip

# Passenger Boarding Overview

- Boarding
- Greet passenger, confirm name if provided
- Assist the passenger from the curb to the rear of the vehicle
- Never wheel passenger into oncoming traffic
- Deploy the ramp and assist loading the passenger
- Secure the passenger and their personal items
- Disembarking
- At the end of the trip, lower the ramp and remove the securement straps as outlined in the vehicle placard
- Assist passenger to the curb safely



# Navigating Curbs

- When going up a curb or single step
  - Move front of chair toward the curb
  - Use the tilt lever to tilt the chair back
  - Push up onto the curb
- When going down
  - Go backwards
  - Use your body against back of chair for safety
- Assisting Manual Wheelchairs
  - Wheelchairs should only be lifted by it's frame, not loose parts
  - Test the handgrips (twist)

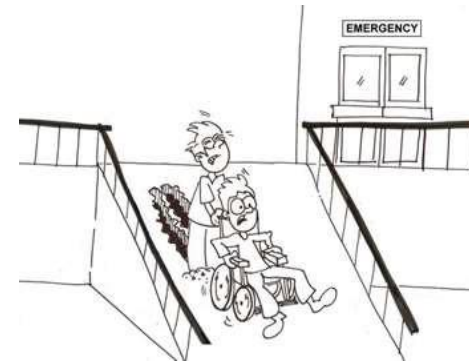
# Stance and Ramp Safety

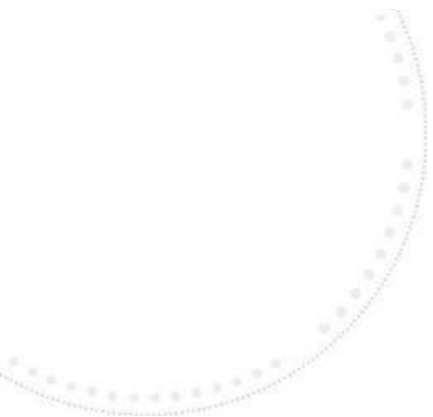
- Place back foot just behind front foot to provide extra support
- When heading backwards or if load is heavy, use body against chair

## Right Way



## Wrong Way





# WAV Types



# Vehicle Types

**Nissan NV 200**



**Toyota Sienna**



**Dodge Grand Caravan**



**Ford Transit Connect**



## Slide 13

---

4 clicking any vehicle goes to the same info on the next slide, how is the navigation meant to work here?  
Rachel Cohen, 1/14/2018

j35 Click on a vehicle on this slide and it will lead you down the appropriate path  
jberger, 2/14/2018

# Vehicle Comparison – Passenger

- Nissan NV 200 16/17
  - Ramp width & length – 30” x 60”
  - Interior width & length – 31” x 51”
  - 4 Passenger Capacity without chair
  - Capacity - Passenger in wheelchair, and 1 passenger
- Dodge Grand Caravan 16/17
  - Ramp width & length – 34” x 47”
  - Interior width & length – 34” x 60”
  - Capacity - Passenger in wheelchair + 4 Passengers



# Vehicle Comparison – Passenger

- Ford Transit Connect 14/15
  - Ramp width & length – 31” x 65”
  - Interior width & length – 31” x 51”
  - Capacity (older version) - Passenger in wheelchair, and 1 passenger
  - Capacity (newer Version) - Passenger in wheelchair + 4 Passengers
- Toyota Sienna 16/17
  - Ramp width & length – 32” x 51”
  - Interior width & length – 33” x 62”
  - Capacity - Passenger in wheelchair + 4 Passengers

# Types of Ramp Conversions



Dodge  
Nissan  
Toyota



Ford  
Toyota



Dodge  
Toyota



# Ramp Basics

## Upon arriving at the destination:

1. Survey the area
2. Stop on level ground
3. Leave room for the ramp platform to open without hitting obstacles
4. Secure the emergency or parking brake
5. Shift the vehicle's transmission into "Park"
6. Active the hazard (four-way) lights

## Once the vehicle is securely parked:

1. Open ramp doors from outside the vehicle
2. Securely lock doors in open position
3. Ask the passenger if they need assistance getting onto the ramp platform
4. Gently, push the wheelchair onto the ramp with the passenger facing forward



# What Vehicle Do You Drive?

**Nissan NV 200**



**Toyota Sienna**



**Dodge Grand Caravan**



**Ford Transit Connect**





# Wheelchair Securement



# Types of Wheelchairs

**Manual**



**Powered**



**Powered Scooter**



**Powered wheelchair and Powered Scooter vary in size and may not fit in all vehicle types**



# Manual Wheelchair

Push Handles/Hand Grips

Seat Back

Arm Rest

Rear Wheel

Push Ring

Brake

Anti-tip bar

Foot Rest

Caster



# Powered Wheelchair



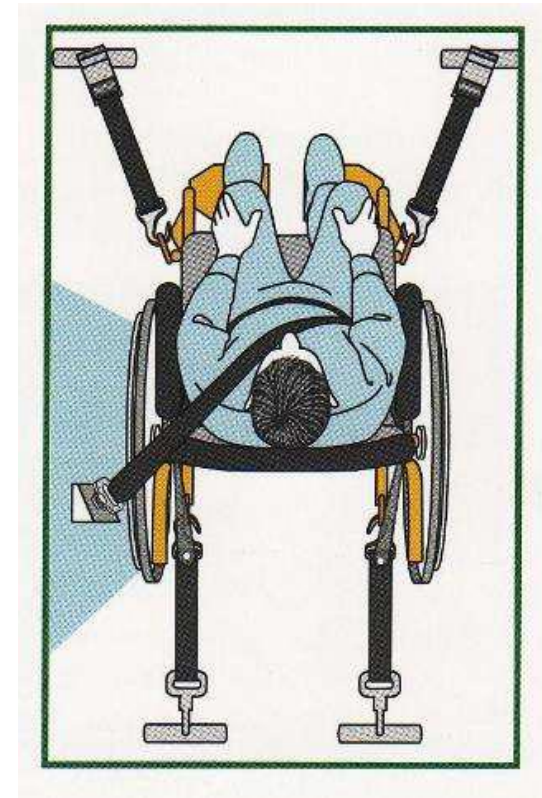


# Power Scooter



# Passenger Securement & Equipment

- 4-Point System
  - Floor Anchorages: Track or Slide 'N Click
  - 4 Wheelchair Tie-downs (retractors)
  - Occupant Securements/Seatbelt



# Securement Requirements

- All wheelchairs must be secured in a forward facing position
  - Manually assist any passenger having trouble utilizing the vehicle ramp
- Driver cannot refuse passenger because of defective or faulty equipment or lack of knowledge how to operate
- Driver must comply with passenger's loading and securement requests

# Pre-check of Securements and Seatbelts

- Make sure your vehicle has a minimum of 4 securement straps per wheelchair location
- Confirm that all retractor straps, lap belt and shoulder belts are in good working condition
- Remove retractors from track until wheelchair passenger is inside the vehicle and situated properly
- Floor anchorages “tracks” should be free of dirt and debris as they can interfere with system operation
  - Carry a brush in the vehicle to clean the tracks as needed



# Tracks and Retractors

- Retractor removal varies based on type of track
  - L-track or A-track
  - Semi- Automatic (requires additional tensioning)
  - Single tightening knob
  - Red lever to release
- Retract the belts until tight. Pull to tighten.



# Wheelchair Securement Video



# Chair Securement- Front

- For a motorized chair, ask the person to turn off power
- Tie down front first - always
- Floor to frame tie down angle is 45 degrees
- The track fitting on the belt must be attached to the floor from 3" to 8" outside the front wheels



# Front Strap Procedure

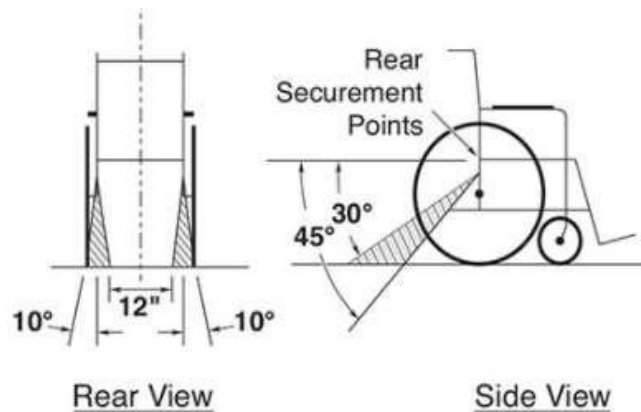
- When inserting the track/pocket fitting into the floor, pull on it to make certain it's secure
- The chair end of the belt should be secured to a permanent, unmovable part of the chair as close to the seat cushion as possible





# Rear Strap Procedure

- Move the chair rearward to remove slack on front straps
- Attach the straps to the floor track just inside the rear wheels and create a 45 degree angle with the floor



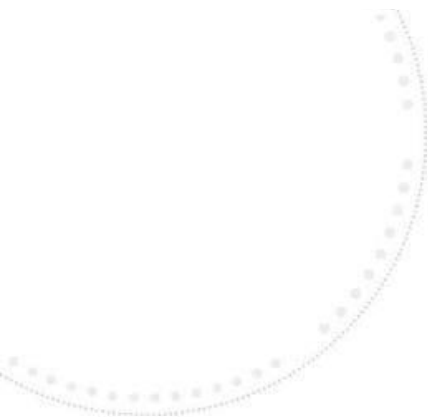
# Shoulder Belts

- Bring belt across the wheelchair to create attachment point
- Place the shoulder belt across the collarbone and diagonally across the occupant's chest
- Connect to lap belt with appropriate attachment



# Safety Tips

- Check for proper securement of all belts
- Check for movement front-back and side to side of the chair – under ADA, no more than 2” in any direction is permitted
- When driving:
  - Watch your speed
  - Turns should be slow and steady
  - A passenger can slide out of their chair if the stop is too abrupt or the turn is too fast




# Hands-On Demo



# Hands on Demo

- Driver will demonstrate to trainer how to
  - Operate the ramp
  - Secure wheelchair
  - Demonstrate appropriate passenger service



Thank you for your active  
participation today!





## Appendix N

### Corporate Procedure

<b>Subject:</b>	Emergency Situations		
<b>Procedure No:</b>	201.003	<b>Created Date:</b>	8/12/2001
<b>Authorized By:</b>	Director, Contact Center	<b>Review Date:</b>	4/26/2021
<b>Department:</b>	Contact Center	<b>Effective Date:</b>	7/21/2021

**PURPOSE:** To identify situations that should be referred to an emergency service provider, such as 911 or their local emergency number.

**POLICY:** Policy 201-Interaction Handling

**RESPONSIBILITY:**

MTM offers non-emergency transportation services.

1. If a member or customer requests immediate transportation to a medical facility the Customer Care Representative (CCR) will determine the nature of the request by asking questions such as the following:
  - a. What situation has prompted this request?
  - b. Is the member having trouble breathing?
  - c. Has there been an accident?
  - d. Is this a woman in labor?
  - e. Is the member calling in for reasons of child abuse, elder abuse or suicide threats?
2. Some examples of real emergencies include, but are not limited to the following:
  - a. Chest pain or shooting pain down left arm
  - b. Loss of consciousness or fainting
  - c. Bleeding that cannot be stopped
  - d. Drug overdose
  - e. Broken bones (EXCEPTION: Minor breaks or fractures, i.e. toes, fingers)
  - f. Sudden loss of vision, speech or movements of a body part
  - g. Seizures
  - h. Injuries from gunshot wounds, knives or accidents
  - i. Recent neck or back injuries
  - j. Labor pains, loss of amniotic fluid or any other serious pregnancy related problems/issues
  - k. Suicidal threats
  - l. Physical abuse to a person (child, elder or spouse)

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*Procedure No: 201.003 - Emergency Situations*

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3. If the CCR and/or the member perceive the need to be an emergency and medical related, the member will be instructed to hang up and immediately call 911 or the local emergency number in their area when applicable.
  - a. In the situation where a member expresses suicidal thoughts or abuse, the CCR should inform the caller that they will need to contact 911 on their behalf. The CCR will place the caller on hold and dial 911 to request a welfare check.
  - b. The CCR should immediately report the incident to their Supervisor and the Contact Center Manager via email that includes the member's contact information and details of the situation.
  - c. Supervisor or Manager will immediately report the incident to the Program Director.
4. If for some reason the customer feels they are unable to make the 911 call for other reasons than specifically noted above, the Supervisor or Manager will assist with calling 911 on the member's behalf.
5. All emergency situations will be reported to the Program/Account Manager for appropriate follow up with the designated representative for the Client.
6. **MTM** does not want to be involved more than necessary in an emergency situation, but must make certain the person understands the instructions and is able to get help.
7. The CCR will document the NET Management System with the appropriate Trip Status Denial Code that will enable the trip to be tracked, reported and trended for quality purposes if needed.

This procedure is reviewed on an annual basis for appropriateness and effectiveness.





## Appendix O

### Corporate Policy

<b>Subject:</b>	Complaints Management		
<b>Policy No.:</b>	7003	<b>Created Date:</b>	4/10/2001
<b>Authorized By:</b>	President/CEO	<b>Review Date:</b>	5/13/2021
<b>Department:</b>	Quality & Continuous Improvement	<b>Approval Date:</b>	7/21/2021

**PURPOSE:** To establish a mechanism and reporting system for all complaints including documentation, evaluation, tracking and trending, resolution and performance improvements in order to improve quality of services.

**POLICY:** All complaints are important and are channeled to the Quality & Continuous Improvement Department (unless protocols state otherwise) for documentation, investigation, tracking and trending, resolution, follow up and reporting.

**Definitions:**

**Client:** Refers to the customer contracted with MTM to handle the covered benefit offered to their covered population.

**Member:** Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, Clients, members and other terms, for MTM purposes, member is being used as a standard meaning for the Client's covered population.

**Complaint:** Any written or verbal expression of dissatisfaction about services, procedures or functions of MTM which causes an intervention by MTM for the member and/or the caller (if different).

**Serious Complaint:** Involves complaints such as, but not limited to those of sexual harassment, discrimination, threatening conversation/behavior or safe driving issues, etc.

**Substantiated Complaint:**

An internal or external complaint in which, after full investigation is completed, the reported issue was found to be a result of not following the standards within MTM's Transportation Provider Handbook or internal policies and procedures.

**Unsubstantiated Complaint:**

***MTM Proprietary Document***

*Policy No: 5003 - Complaints Management*

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An internal or external complaint in which, after full investigation is completed, the reported issue was found to be in compliance with MTM's Transportation Provider Handbook or internal policies and procedures.

**Warm Transfer:** A process where MTM is not delegated by the Client to handle complaints or for a specific process where the member needs additional assistance. In a Warm Transfer, the member will be transferred as directed by the Client to a location (phone number) other than MTM. MTM staff will remain on the line until a live person is reached.

#### **RESPONSIBILITY:**

- A. A toll free number is available for Clients, members and healthcare providers to call and file a complaint.
- B. All MTM personnel are trained to forward all calls (according to Client contract) regarding complaints to the We Care Line where an Escalation Supervisor will intake and document the issues.
- C. An assigned Resolution Specialist will conduct the investigation, follow up, and reporting for all complaint issues, per contract.
- D. If the complaint call is received after normal business hours or during holidays, the caller will leave the complaint with a Contact Center Representative.
- E. The assigned Resolution Specialist will then begin the investigation, resolution, and follow-up process. Resolution Specialists work with pertinent stakeholders to resolve complaints and initiate performance improvement plans. The Resolution Specialist will document and code all complaints in the Non-Emergency Transportation (NET) Management System.
- F. All complaints will be resolved as identified within the Client specific contract and/or protocols. Any complaint not resolved in that timeframe will be considered delinquent.
- G. The Resolution Specialists will provide education to pertinent stakeholders as part of the resolution process.
- H. If the complaint is found to be unsubstantiated at the time of the investigation, the complaint is coded as an unsubstantiated complaint and the transportation provider is notified by the Resolution Specialist. (Note: Even if the complaint is found to be unsubstantiated, the complaint is documented on the Client monthly report.)
- I. Resolution Specialists use a standard format for reports sent to Clients.
- J. All Quality Reports are sent to the Client per Client contract via their FTP Server. HIPAA Privacy Rule 45 CFR 164.530 confidentiality clause, password protected, encrypted, or a secured server. (Note: Weekly and Daily reports are sent to Clients per contractual requirements.)
  - a. Some clients may be enrolled in PBI cloud report that would meet these reporting requirements as well but in a live update function. Clients have the opportunity to enroll in this option during implementation or later.
- K. Quality & Continuous Improvement department staff maintains discretion and confidentiality in all complaint situations.
- L. All complaints will be tracked and trended monthly and presented to relevant stakeholders for recommendations on follow up and/or Performance Improvement Plans if the transportation provider is consistently not meeting quality expectation.

#### **MTM Proprietary Document**

*Policy No: 5003 - Complaints Management*

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- M. Disciplinary action recommendations will be presented to the Quality & Compliance Committee (Q&C) for approval.
- N. **MTM** shall follow its current policies which identify the appropriate plan of action regarding vendor non-compliance and the application of appropriate performance improvement action(s).
- O. Complaints are reported to the Quality & Compliance Committee on a quarterly basis for tracking, trending, and quality improvement.

This policy is reviewed on an annual basis for appropriateness and effectiveness.



## Appendix P

### Corporate Procedure

<b>Subject:</b>	Complaint Log Process - RI		
<b>Procedure No:</b>	7003.002	<b>Created Date:</b>	6/26/2019
<b>Authorized By:</b>	Director, Quality & Continuous Improvement	<b>Review Date:</b>	5/14/2021
<b>Department:</b>	Quality & Continuous Improvement	<b>Effective Date:</b>	7/21/2021

**PURPOSE:** To establish a mechanism and reporting system for all complaints including documentation, evaluation, tracking and trending, resolution and performance improvements in order to improve quality of services.

**POLICY:** All complaints are important and are channeled to the Quality & Continuous Improvement (Q&CI) Department (unless protocols state otherwise) for documentation, investigation, tracking and trending, resolution, follow up and reporting.

**Definitions:**

**Client:** Refers to the customer contracted with MTM to handle the covered benefit offered to their covered population.

**Member:** Refers to the population served by MTM Clients.

**Complaint:** Any written or verbal expression of dissatisfaction about services, procedures or functions of MTM which causes an intervention by MTM for the member and/or the caller (if different).

**Serious Complaint:** Involves complaints such as, but not limited to those of sexual harassment, discrimination, threatening conversation/behavior or safe driving issues, etc.

**Substantiated Complaint:**

An internal or external complaint in which, after full investigation is completed, the reported issue was found to be a result of not following the standards within MTM's Transportation Provider Handbook or internal policies and procedures.

**Unsubstantiated Complaint:**

An internal or external complaint in which, after full investigation is completed, the reported issue was found to be in compliance with MTM's Transportation Provider Handbook or internal policies and procedures.

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*Procedure No: 7003.002 Complaint Log Process - RI*

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1. Complaints that are found to be unsubstantiated after the initial review shall be reviewed by a supervisor or above to confirm the initial disposition.

**RESPONSIBILITY:**

- A. Escalated complaints received on a daily basis at QM@mtm-inc.net
  - a. All escalated complaints are sent over by EOHHS and are documented upon receipt.
  - b. They are investigated and closed within 2 business days based on contractual agreement between EOHHS and MTM
- B. Complaints, as well as the resolutions, are documented in the NET tracking system and added to the Complaint Log
- C. MTM will respond verbally to all parties directly involved within twenty-four (24) hours or in writing within seventy-two (72) of receipt of a complaint or appeal. Complaints regarding transportation services referred to MTM by EOHHS for resolution require a written response from MTM to EOHHS within the timeframe requested by EOHHS, but no more than three (3) business days after receipt of the complaint.
- D. Complaint Log is sent to the MTM Rhode Island Triage Team and Community Outreach as applicable for outreach to the complainant
  - a. Outreach occurs three times over three different days at three different times of day
  - b. Conversation details, actions taken, as well as dates and times of outreach are documented in the Complaint Log
  - c. All complaints will be tracked and trended monthly and presented to Quality & Continuous Improvement and Network Management for recommendations on follow up and/or Performance Improvement Plans if the transportation provider is consistently not meeting quality expectation. This tracking and trending is distributed internally and is available upon request.
  - c. This trending looks at complaint drivers on multiple levels in regards to internal complaints as well as complaints made against transportation providers.
  - d. Top contributors are identified and addressed with the appropriate internal departments as well as logistics- who then addresses them with the providers.
  - e. These steps are taken to decrease the volume of complaints by proactively addressing any trends that are found.
- E. Updated Complaint Log is returned to EOHHS on a weekly basis - on Fridays by 11:00 am
- F. Tier one complaints will be closed within 30 calendar days of receipt
  - a. Tier one complaints- Issues/incidents involving safety, negligence and injury that require immediate attention. Such issues include injury requiring medical care, accidents resulting in injury, evidence of weapon, assault, incidents that require police assistance, sexual harassment, and other incidents where the recipient in danger. Notification within six (6) hours or sooner upon notification from the TP, facility, or recipient.
- G. Tier two complaints will be closed within 30 calendar days of receipt.
  - a. Tier two complaints- Issues/incidents involving service issues such as accidents without injury (with/without police assistance), wheelchair tie-down issues (not resulting in

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*Procedure No: 7003.002 Complaint Log Process - RI*

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injury), unresolved disagreements, habitual driver no-show/late/rudeness and other disruptions and questionable behaviors. Notification within forty eight (48) hours or sooner upon notification from the TP, facility, or recipient.

- H. Tier three complaints can be standard complaints or serious complaints. They will be closed within 5 business days of receipt
  - a. If the tier three complaint is escalated it will be closed within two business days of receipt.
  - b. Tier three complaints are included in the monthly report.

This procedure is reviewed on an annual basis for appropriateness and effectiveness.



## Appendix Q

### Corporate Policy

<b>Subject:</b>	Reporting and Handling of Accidents/Incidents		
<b>Policy No.:</b>	7005	<b>Created Date:</b>	8/23/2001
<b>Authorized By:</b>	President/CEO	<b>Review Date:</b>	11/12/2021
<b>Department:</b>	Quality & Continuous Improvement	<b>Approval Date:</b>	11/12/2021

**PURPOSE:** To define a process for handling, documenting and reporting information relating to accidents and incidents involving members.

**POLICY:** All information regarding accidents and incidents will be maintained, handled and reported according to MTM established policies and procedures. Reporting of accident/incident information to clients will be completed in compliance with contract requirement.

**Definitions:**

**Client:** Refers to the customer contracted with MTM to handle the covered benefit offered to their covered population.

**Member:** Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, members and other terms, for MTM purposes, member is being used as a standard meaning for the Client's covered population.

**Accident:** Any mishap involving a subcontracted transportation provider's vehicle and a member. This includes, but not limited to a fender bender, blown tire, etc.

**Incident:** Any non-vehicular mishap involving a member while in the care of a MTM transportation provider. This includes, but not limited to the passenger falls while trying to enter the vehicle, wheelchair tip or securement issue resulting in harm to the passenger, passenger becoming ill in the vehicle, etc.

**Internal Alert:** Any reported accident/incident which requires immediate response and direction from MTM's Executive team, including but not limited to serious cases of abuse, neglect, sexual misconduct or injury, missing person or death.

**RESPONSIBILITY:**

1. All accidents/incidents are reported directly to the Quality & Continuous Improvement Department (Q&CI). Reporting timeframes shall be as follows:

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*Policy No: 7005 - Reporting and Handling of Accidents/Incidents*

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- a. All accidents/incidents considered an "Internal Alert" shall be reported by the Resolution Specialist within one (1) day of receipt.
  - b. All other accidents/incidents shall be reported to the appropriate parties in accordance to the contractually obligated timeframe.
  - c. Information received is to be logged immediately into the Non-Emergency Transportation (NET) Management System in which information is logged and maintained.
2. The Resolution Specialist will request the transportation provider complete an accident/incident form and submit it to MTM Q&CI Department within twenty-four hours of the accident/incident.
3. Regardless of the type or severity of an accident/incident, MTM retains the right to require a driver submit to drug/alcohol testing when deemed necessary:
  - a. When necessary, drug/alcohol testing should be performed immediately following or within, at most, 24 hours of the event in question.
  - b. Documentation explaining why the testing could not take place within the allotted timeframe must be retained.
4. Once the results are back, the Network Management designee will work with the owner or managing official of the company regarding the results. If the results are found to be negative, the driver will be allowed to continue working.
5. If an incident or accident results in damage to the member's property, MTM will attempt to work with providers for reimbursement if fault can be substantiated. A member may also independently seek reimbursement directly from the transportation provider at fault. MTM will not seek damages from a transportation provider on behalf of the member, but will provide any necessary and related information to the member upon request and will be available to the member to support them in their efforts. MTM may make certain efforts to act as a liaison between the member and provider if that is deemed to be necessary and expedient.
  - a. Per section 9. A of the Transportation Provider Service Agreement, transportation providers are required to carry General and Automobile Liability Insurance which policies cover property damage in the event they occur.
  - b. The transportation provider is responsible for fixing, replacing, or reimbursing for the damaged personal property within 30 days of fault being determined. If this timeframe cannot be met, documentation explaining why must be provided to MTM.
  - c. If the timeframe cannot be met, the transportation provider is responsible for keeping MTM and the member apprised of the estimated date the equipment will be ready.
6. In the event of an Internal Alert, the following must be informed:
  - a. Director, Quality & Continuous Improvement
  - b. Client Relationship Manager, Client Services
  - c. Sr. Director, Network Management
  - d. Program Director or Director of Operations
  - e. Regional Vice President Operations
  - f. Vice President, Program Governance
  - g. Senior Counsel, Litigation & Claims
  - h. Manager Legal Operations

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- i. Risk Management Team
  - j. Supervisor, Quality Operations
  - k. Client - separate notification clearly identifying the internal alert and including specified information should be sent by the Account Management team to the Client within the timeframes outlined in the contract and the notification should be reviewed by MTM's legal team prior to submission to the Client
7. The Senior Counsel Litigation & Claims, along with the Risk Manager, will determine if MTM's Liability Insurance Carrier is to be notified.
8. All reports of the accident/incident will be documented and saved electronically. The Resolution Specialist will check MTM records for copies of current insurance, driver training records, driver background check and DMV record for the driver involved.
9. When there is a fatality involved, Network Management will complete an on-site visit within 3-5 business days. If deficiencies are found, all future trips may be cancelled until corrected. Whenever there is a loss of human life, each surviving safety sensitive employee operating the vehicle at the time of the accident/incident must be tested. Safety-sensitive employees not in the vehicle (e.g., attendants), whose performance could have contributed to the accident/incident must also be tested.
10. The Senior Counsel Litigation and Claims reserve the right to determine the necessity of an on-site visit and the time line of completion regardless of the circumstances.
11. All inquiries by the media will be forwarded to the Marketing designee and the Senior Counsel Litigation & Claims.
12. "Privileged Memo to Legal" template will be used for any additional information that needs to be shared internally (e.g., root cause analysis, sensitive information) It would be sent via email to legal with any additional internal team members requiring the shared information carbon copied.

This policy is reviewed on an annual basis for appropriateness and effectiveness.



## Appendix R

### Corporate Procedure

<b>Subject:</b>	Reporting and Handling of Accidents/Incidents - RI		
<b>Procedure No:</b>	7005.008	<b>Created Date:</b>	12/21/2018
<b>Authorized By:</b>	Director, Quality Operations	<b>Review Date:</b>	4/26/2021
<b>Department:</b>	Quality Operations	<b>Effective Date:</b>	7/21/2021

**PURPOSE:** To define a process for handling, documenting and reporting information relating to accidents and incidents involving members.

**POLICY:** 7005 Reporting and Handling of Accident/Incidents

**Definitions:**

**Client:** Refers to the customer contracted with MTM to handle the covered benefit offered to their covered population.

**Member:** Refers to the population served by MTM Clients.

**Accident:** Any mishap involving a subcontracted transportation provider's vehicle and a recipient. This includes, but not limited to a fender bender, blown tire, etc.

**Incident:** Any non-vehicular mishap involving a recipient while in the care of a MTM transportation provider. This includes, but not limited to the passenger falls while trying to enter the vehicle, wheelchair tip or securement issue resulting in harm to the passenger, passenger becoming ill in the vehicle, etc.

**Internal Alert:** Any reported accident/incident which requires immediate response and direction from MTM's Executive team, including but not limited to serious cases of abuse, neglect, sexual misconduct or injury, missing person or death.

**RESPONSIBILITY:**

- A. The Contractor shall document accidents and incidents that occur in conjunction with a scheduled trip when a Member is present in the vehicle. Details shall be reported in the Accident and Incident Report within the timeframes outlined in the contract per the Tier levels below. The Contractor will submit investigation summary and corrective actions, as needed within no more than thirty (30) calendar days from the accident or incident. In addition to individual reports provided for each reported accident or incident, the

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Contractor shall provide EOHHS with a summary of all accidents and incidents on the monthly report.

B. All accidents/incidents are reported directly to the Quality & Compliance Department (Q&C).

Reporting timeframes shall be as follows:

- All accidents/incidents shall be reported to the appropriate parties in accordance to the contractually obligated timeframe.
  - o Tier One Complaints will be reported to EOHHS within six hours of receipt of the notification of the accident or incident. A follow up report will be supplied upon closure of the investigation.
    - All accidents/incidents considered an "Internal Alert" shall be reported by the Resolution Specialist to MTM's Executive VP and General Counsel; Director, Quality & Compliance; Director, Quality Operations; Director, Logistics Management; Program Director of Rhode Island immediately
  - o Tier Two Complaints will be reported to EOHHS within 24 hours of receipt of the notification of the accident or incident. A follow up report will be supplied upon closure of the investigation.
  - o Tier Three Complaints will be reported to EOHHS on the Monthly Quality Report.
- Information received is to be logged immediately into the appropriate documentation systems and the **NET** Management System.

C. The Resolution Specialist will request the transportation provider complete an accident/incident form and submit it to MTM Q&C Department within 24 hours of the accident/incident.

D. Regardless of the type or severity of an accident /incident, MTM retains the right to require a driver submit to drug/alcohol testing when deemed necessary:

- When necessary, alcohol testing should be performed within two hours following the event in question
- If alcohol testing within two hours of the event is impossible, the testing should be performed as soon as possible, not to exceed eight hours from the time of the event. Documentation explaining why the testing could not take place within the allotted timeframe must be retained.
- When necessary and as with alcohol testing, drug testing should be performed as soon as possible following the event in question.
- If immediate drug testing is not possible and testing does not occur within 32 hours from the time of the event, the employer should cease any further attempts to have the testing performed and documentation explaining why the testing could not take place within the allotted timeframe must be retained.

E. Once the results are back, the Logistics designee will work with the owner or managing official of the company regarding the results. If the results are found to be negative, the driver will be allowed to continue working.

- If an incident or accident results in damage to the member's property, MTM will attempt to work with providers for reimbursement if fault can be substantiated. A member may also independently seek reimbursement directly from the

**MTM Proprietary Document**

*Policy No: 7005.008 - Reporting and Handling of Accidents/Incidents - RI*

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transportation provider at fault. MTM will not seek damages from a transportation provider on behalf of the member, but will provide any necessary and related information to the member upon request and will be available to the member to support them in their efforts. MTM may make certain efforts to act as a liaison between the member and provider if that is deemed to be necessary and expedient.

- F. In the event of an Internal Alert the Executive VP and General Counsel will determine if MTM's Liability Insurance Carrier is to be notified.
- G. All reports of the accident/incident will be documented and saved electronically. The Resolution Specialist will check MTM records for copies of current insurance, driver training records, driver background check, and OMV record for the driver involved.
- H. When there is a fatality involved, Logistics will complete an on-site visit within three to five business days. If deficiencies are found, all future trips may be cancelled until corrected. Whenever there is a loss of human life, each surviving safety sensitive employee operating the vehicle at the time of the accident/incident must be tested. Safety-sensitive employees not in the vehicle (e.g., attendants) whose performance could have contributed to the accident/incident must also be tested.
- I. The Executive VP and General Counsel reserve the right to determine the necessity of an on-site visit and the timeline of completion regardless of the circumstances.
- J. All inquiries by the media will be forwarded to the Marketing designee and the Executive VP and General Counsel.

This procedure is reviewed on an annual basis for appropriateness and effectiveness.



# Appendix S

## Corporate Procedure

<b>Subject:</b>	Transportation Provider Contracting		
<b>Procedure No:</b>	101.001	<b>Created Date:</b>	1/30/2012
<b>Authorized By:</b>	Director, Provider Network	<b>Review Date:</b>	4/26/2021
<b>Department:</b>	Network Management	<b>Effective Date:</b>	7/21/2021

**PURPOSE:** To ensure that MTM maintains a Provider Network that is sufficient in the number and types of providers needed to meet the transportation needs of our clients. To verify each Transportation Provider submits all required documentation to MTM's Online Credentialing Repository. All information will be reviewed for accuracy and verified prior to being approved for participation in the MTM Network. Network Management will also validate and assess the qualifications of the Transportation Provider's drivers prior to the provision of transportation services. The decision to include a Transportation Provider and individual drivers in the MTM Provider Network is based on a review and evaluation of the Transportation Provider and driver's credentials. Network Management will also add Transportation Providers into the MTM NET System and will notify the applicable departments of the Transportation Providers status updates. Network Management monitors each Transportation Provider so they are not being utilized for MTM business when there are issues of non-compliance.

**NOTE:** MTM will verify all documentation before approving transportation providers, drivers and vehicles

**POLICY:** Policy 101- Transportation Provider Contracting

**RESPONSIBILITY:**

**Recruiting/Credentialing/Contracting:**

Transportation Providers must meet MTM standards and satisfy a recruiting or network adequacy need in order to be approved for network participation.

All drivers in network will go through MTM's current credentialing process and must be approved by the Credentialing Department prior to providing services for MTM.

1. To begin the contracting/credentialing process the Provider Management Representative enters a ticket through the IT Service Portal to add the provider to the MTM Credentialing site. The Provider Management Representative gives the Transportation Provider a username, password, and requests training for the Transportation Provider from the MTM Network Training Department. The Transportation provider may begin submitting credentials for Network Management verification and approval.
2. All Owners/Officers/Drivers will be checked against State and Federal banned lists.

**MTM Proprietary Document**

*Procedure No: 101.001 - Transportation Provider Contracting*

3. Once all credentials have been submitted, verified and approved by MTM, the Transportation Provider can then be approved to transport MTM members.
4. Drivers are credentialed upon entry into the MTM Transportation Provider Network and re-credentialed on an annual basis thereafter.
5. MTM's Credentialing Department reviews all documents as they relate to the credentialing/re-credentialing process and make the decision to either approve or deny the Transportation Provider/driver. MTM will verify all credentialing documents before approving a driver.
6. If the Transportation Provider/driver is denied, Network Management will notify the provider verbally and/or by e-mail.
7. The Transportation Provider has the right to appeal the decision within 30 days.
8. All appeals are reviewed by the Provider Management Representative and Manager for the final decision. Legal, Quality & Compliance or other departments may be consulted when making a decision to deny a Provider or driver.

Temporary Suspension of Transportation Providers:

Reasons for Issuing a Suspension (including, but not limited to the following):

- Driver Issues
- Vehicle issues
- Insurance issues
- Continued Poor performance or other non-compliance issues

When a Transportation Provider is suspended, they must remain suspended until reasons for suspension are resolved. MTM Affiliates are not subject to suspension without approval from MTM's CEO.

- A. Network Management is responsible for provider suspension and will provide oversight from start to finish. Network Operations will notify and secure approval from VP Ops and Legal for suspension of or temporary closure of Transportation Providers. Transportation Providers are continually monitored to ensure they remain in compliance with all MTM requirements.
- B. Transportation Providers found to be out of compliance (situations including but not limited to endangerment of a member or cause of unnecessary liability to MTM) are either suspended or escalated to a Network Manager depending on the risk impact to adequacy of the area.
- C. Some infractions considered to be of a "serious" nature would include but are not limited to the following:
  - a. Lack of current insurance in accordance with the Transportation Provider's contractual agreement.
  - b. Loss of state required license to perform work.
  - c. Vehicle safety issues.

**In the case where the issue is a lack of current insurance:**

1. The Network Representative will reference and follow the Expiring Credentials Management Procedure.
2. The provider is informed that they may acquire and upload a signed document on their insurance company letter head stating that they are covered while the broker shops for

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new coverage. This document allows the provider to operate for 30 days from the date uploaded, up to 15 days past the original expiration date.

3. If option "B" is not acquired, the 7 day closure process begins.
  - The provider is closed to any "new" trips after the expiration date.
  - Network handles this closure, and notifies CSC/SNT through a 7 Day Closure Email
4. If the provider remains in the same status at 4 days, the 4 day closure process begins and currently assigned trips are reassigned to alternate providers.
5. The provider remains closed to trips until adequate insurance coverage is obtained, uploaded and approved.

*In the case where the concern involves one particular driver or vehicle, the Transportation Provider can remain open in the NET System but will be required not to use that particular driver or vehicle until the issue has been resolved to MTM's satisfaction.*

- D. Network Management will notify the Transportation Provider of the deactivation for non-compliance verbally and/or by e-mail. Network Management will also inform the Transportation Provider that MTM will begin canceling all current trips, and no future trips will be awarded until the appropriate document(s) have been obtained. Cancelled trips will not be re-awarded to the Transportation Provider once appropriate documentation has been provided to MTM.
  - a. Network Management will note the reason for closure of the Transportation Provider in MTM's NET Management System.
  - b. Network Management will notify applicable departments when a deactivated Transportation Provider is reinstated.
- E. Transportation Providers can be suspended and/or disciplined when their service level falls below MTM's acceptable level and/or when the safety of the member is in question.
- F. Network Management can close a Transportation Provider in the NET System, however, terminations may only be administered by MTM's General Counsel with approval of MTM's CEO.

Issues are categorized into two groups:

1. **Non-Safety Issue** is defined as any issue that does not directly endanger the immediate health and welfare of the member. MTM reserves the right to terminate, suspend, or lower the trip volume of any Transportation Provider upon the occurrence of any material non-safety complaint or incident. MTM shall determine, in its sole discretion, the materiality of any non-safety complaint or incident. For minor non-safety issue involving the failure to meet required performance standards such as, but not limited to, no-shows and turn backs.
2. **Safety Issue** is defined as any complaint that directly endangers the immediate health and welfare of the member. MTM reserves the right to suspend any Transportation Providers and/or individual drivers, or terminate any Transportation Provider upon the occurrence of a material breach in the safety of any member. MTM shall determine, in its sole discretion, the materiality of any breach in safety.

This procedure is reviewed on an annual basis for appropriateness and effectiveness.

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# Appendix T

## Corporate Procedure

<b>Subject:</b>	Transportation Provider Terminations		
<b>Procedure No:</b>	101.004	<b>Created Date:</b>	4/4/2016
<b>Authorized By:</b>	Director, Provider Network	<b>Review Date:</b>	4/26/2021
<b>Department:</b>	Network Management	<b>Effective Date:</b>	7/21/2021

**PURPOSE:** To ensure MTM maintains a compliant and safe network by implementing a set of procedures to initiate the termination of a Transportation Provider. The decision to terminate the Transportation Provider Service Agreement with a Transportation Provider should be made in accordance with the Transportation Provider Service Agreement. **All terminations will be reported, internally and to the client, in accordance with contract requirement and within required reporting timeframes.**

**POLICY:** Policy 101- Transportation Provider Contracting

**WITHOUT CAUSE TERMINATIONS:**

**RESPONSIBILITY:**

A request for the termination of a Transportation Provider without cause in MTM's Network must be initiated by one of the following individuals within MTM's organization:

- The CEO
- The COO
- Vice President of Operations
- A Senior Director of Network Operations
- Program Director
- Compliance
- A Transportation Manager or Vendor Account Manager

- A. Network Management is the owner of transportation provider terminations that are without cause and will provide oversight through the entire process.
- B. Transportation Providers should be only terminated in accordance with the terms of the Transportation Provider Service Agreement.
- C. The request to terminate a Transportation Provider without cause must be reviewed and approved by one of the following individuals:
  - The CEO
  - The COO

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- Vice President of Operations
  - A Senior Director of Network Operations
  - Program Director
  - A Regional Vice President
- D. Once the 'without cause' termination is approved, the Vendor Account Manager will send the Notice of Termination ("Notice") to the Transportation Provider via certified mail and email.
- E. Once the Notice has been sent out to the Transportation Provider, the Vendor Account Manager will provide a copy of the Notice to the Compliance Department, the Quality Department, Manager for Provider Contracts, the Credentialing Department and the Senior Manager in the Accounts Payable Department.
- F. The Vendor Account Manager is responsible for any payment holds made in accordance with the terms of the Transportation Provider Service Agreement with the Senior Manager of the Accounts Payable Department.
- G. All correspondence and applicable materials including provider education, discipline issues, suspensions, Performance SLA's, Quality findings, Fraud, Waste and Abuse findings and termination documentation shall be maintained in the Transportation Provider's file.

### **For Cause Terminations**

#### **RESPONSIBILITY:**

A request for the termination of a Transportation Provider for cause in MTM's Network must be initiated by one of the following individuals in MTM's organization for review and approval of the Legal Department:

- The CEO
- The COO
- Vice President of Operations
- A Senior Director of Network Operations
- A Regional Vice President
- Program Director
- A Transportation Manager or Vendor Account Manager

- 1) The following information should be sent to the Legal Department when a request for a **"for cause" termination** is made:
  - a. The Name of the Transportation Provider
  - b. A copy of the applicable Transportation Provider Service Agreement
  - c. Name of the Owner for the Transportation Provider
  - d. The best postal and electronic email address for the Transportation Provider
  - e. The reason the request that a termination for cause is being made along with all supporting documentation
- 2) Once the notice of a **'for cause'** termination ("Notice") has been reviewed and approved by the Legal Department, it is the Program Director's responsibility to ensure that the Notice is timely mailed to the Transportation Provider via certified mail and electronic mail.

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- 3) The Program Director will then ensure the Notice is sent to the Compliance Department, the Quality Department, Manager for Provider Contracts, the Credentialing Department and the Senior Manager in the Accounts Payable Department.
- 4) The Program Director is responsible for any payment holds made in accordance with the terms of the Transportation Provider Service Agreement with the Senior Manager of the Accounts Payable Department.
- 5) All correspondence and applicable materials including provider education, discipline issues, suspensions, Performance SLA's, Quality findings, Fraud, Waste and Abuse findings and termination documentation shall be maintained in the Transportation Provider's file.

#### **Acknowledgements of Terminations Initiated by a Transportation Provider**

- 1) If the request to terminate the Transportation Provider Service Agreement is initiated by a Transportation Provider, the Vendor Account Manager shall draft and send MTM's 'acknowledgement' of termination via electronic mail to the provider.
- 2) The Vendor Account Manager shall then provide a copy of the 'acknowledgement' letter along with the Provider's Notice to terminate to the Compliance Department, the Quality Department, Manager for Provider Contracts, the Credentialing Department and the Senior Manager of the Accounts Payable Department.
- 3) The Vendor Account Manager is responsible for any payment holds required in accordance with the terms of the Transportation Provider Service Agreement with the Senior Manager of the Accounts Payable Department.
- 4) All correspondence and applicable materials including provider education, discipline issues, suspensions, Performance SLA's, Quality findings, Fraud, Waste and Abuse findings and termination documentation shall be maintained in the Transportation Provider's file.

#### **Appeal Process**

- 1) Transportation Providers have the right to appeal the termination of the Transportation Provider Service Agreement.
- 2) Appeals of a termination that was made either without cause or for cause must be received in writing and directed to the attention of the Program Director.
- 3) After an evaluation of the appeal has taken place, the Program Director will ensure that MTM's appeal response is sent to the Transportation Provider via electronic mail.
- 4) The Program Director will also ensure that a copy of the Transportation Provider's 'appeal' and MTM 'appeal response' to the Compliance Department, the Quality Department, and Manager for Provider Contracts.
- 5) The Program Director is responsible for informing the Credentialing Department and the Senior Manager in the Accounts Payable Department if a Transportation Provider's appeal is accepted and the provider will remain in MTM's network.

#### **Reinstatement**

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A provider that was previously terminated from MTM's network must enter into a new Transportation Provider Service Agreement with MTM and go through the required credentialing and training process once again.

-This procedure is reviewed on an annual basis for appropriateness and effectiveness.

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