

Division of Medicaid	New:	Date:
State of Mississippi	Revised: X	Date: 11/01/06
Provider Policy Manual	Current:	10/01/07
Section: Non-Emergency Transportation (NET)	Section: 12.11	
Subject: Monitoring/ Quality Assurance	Pages: 2	
	Cross Reference: NET 12.14	

Monitoring

The NET broker shall develop and implement a plan for monitoring NET providers' compliance with all applicable local, State and federal laws and regulations. The broker shall ensure that NET providers comply with the terms of their subcontracts and all NET provider-related requirements of the contract, including driver requirements, vehicle requirements, complaint resolution requirements, and the delivery of courteous, safe, timely, and efficient transportation services. Monitoring activities shall include, but are not limited to:

- On-street observations;
- Accident and incident reporting;
- Statistical reporting of trips;
- Analysis of complaints;
- Driver licensure, driving record, experience, and training;
- Participant assistance;
- Completion of driver trip logs;
- Driver communication with dispatcher; and
- Routine scheduled vehicle inspections and maintenance.

The broker shall have written procedures for ensuring that an appropriate corrective action is taken when a NET provider furnishes inappropriate or substandard services, when a NET provider does not furnish services that should have been furnished, or when a NET provider is out of compliance with State or federal laws or regulations. The broker shall report quarterly to DOM on monitoring activities, monitoring findings, corrective actions taken, and improvements made by the NET provider.

As part of the monitoring process, the broker shall conduct every six (6) months, a beneficiary satisfaction survey regarding the NET Broker Program. The initial six (6) month period shall be the first six (6) months during which the broker delivers NET Services. The survey topics shall include, but are not limited to (1) confirmation of a scheduled trip; (2) driver and broker staff courtesy; (3) driver and attendant assistance, when required; (4) overall driver behavior; (5) driver safety and operation of the vehicle; (6) condition, comfort, and convenience of the vehicle; and (7) punctuality of service. The purpose of the survey is to verify the availability, appropriateness and timeliness of the trips provided and the manner in which broker's staff and the NET provider's staff interacted with beneficiaries. The survey responses received, and broker's analysis of those responses shall be submitted to DOM no later than sixty (60) days after the surveys are mailed.

Validation Checks

The broker's payment procedures shall ensure that NET provider claims for reimbursement match authorized trips and that the trips actually occurred. The broker shall validate that transportation services paid for under the contract are properly authorized and rendered. The broker shall perform validation checks on a random sample of at least 5% of NET service requests in a month, both prior to the authorization of the request and after the services are rendered, as specified below. DOM, at its sole discretion, may require validation checks of trips to specific services. The broker shall conduct random pre-transportation validation checks prior to authorizing the request for no fewer than 3% of the NET Services requests received in a month. The broker shall contact the provider and verify that the beneficiary has an appointment for a covered medical service. The broker shall not verify the medical necessity of an appointment. If the broker verifies with the provider that no appointment exists, or that the service is not a covered medical service, the broker shall record in its computer system the reason for the failed validation check, and broker shall deny the request. If a pre-transportation validation check cannot be completed because the call to the provider resulted in a busy signal or no answer, broker shall flag the

request for a post-transportation validation check, and the attempt at validation shall not be counted toward the 3% requirement.

The broker shall conduct random post-transportation validation checks on no fewer than 2% of the NET services requests received in a month. The broker shall contact the provider and verify that the beneficiary had an appointment for a covered medical service. The broker shall verify that the beneficiary received a covered medical service. The broker shall not verify the necessity of the transportation or of the medical service, but only that the service occurred. If broker verifies with the provider that there was no appointment, that the appointment was not kept or that the service was not a covered medical service, broker shall record in its computer system the reason for the failed validation check. If a post-transportation validation check cannot be completed because the call to the provider resulted in a busy signal or no answer after three (3) attempts, broker shall enter into its system information that will alert the Call Center Staff that any future requests to this specific provider shall be validated before it can be authorized.

The broker shall perform pre-transportation and post-transportation validation checks for a percentage of fixed route transportation to be established by DOM.

Monitoring Activities Conducted by DOM

DOM will monitor the broker on an on-going basis to ensure that services are being provided in accordance with the terms of the contract. DOM, the Mississippi Department of Audit, Department of Health and Human Services (DHHS), Centers for Medicare and Medicaid Services (CMS), the Office of Inspector General (OIG), the General Accounting Office (GAO), or any other auditing agency prior-approved by DOM, or their authorized representative shall at all reasonable times, have the right to enter onto the broker's premises, or such other places where duties under the NET broker contract are being performed, to inspect, monitor, or otherwise evaluate (including periodic systems testing) the work being performed. The broker must provide access to all facilities and assistance for DOM and Mississippi Audit Department representatives. All inspections and evaluations shall be performed in such a manner as will not unduly delay work. Refusal by the broker to allow access to all documents, papers, letters or other materials shall constitute a breach of contract. All audits performed by persons other than DOM staff will be coordinated through DOM and its staff.

Broker Activity Reports

The broker will be required to provide DOM with reports and utilization data related to the broker's activities. DOM will provide the broker with a listing of required reports and utilization data. These reports and data items will be due within the timeframes stated. DOM reserves the right to request ad-hoc reports and modify the listing at any time.

Performance failures by the broker may cause DOM to ~~access liquidated~~ assess liquidated damages against the broker. ~~(See Section 12.14)~~ Refer to NET, Section 12.14, Liquidated Damages in this manual