



## CORPORATE POLICY & PROCEDURE

	Policy Name: CO29 - NEMT Quality Assurance Program and Plan
Department: Compliance	Policy Number: CO29
Version: 7	Creation Date: 07/17/2019
Revised Date: 1/16/20, 9/4/20, 1/12/22, 1/3/23, 12/11/2025	
Line of Business: <input checked="" type="checkbox"/> All <input type="checkbox"/> Umpqua Health Alliance <input type="checkbox"/> Umpqua Health - Newton Creek	
<input type="checkbox"/> Umpqua Health Management <input type="checkbox"/> Umpqua Health Network	
Approved By: Jamie Smith Reese (Compliance Officer) Date: 12/17/2025	

### POLICY STATEMENT

Umpqua Health is committed to monitoring and evaluating its provision of non-emergent medical transportation services (NEMT) to its Umpqua Health Alliance (UHA) members by ensuring all Federal, State, and contractual requirements are followed.

### PURPOSE

This policy serves to outline how Umpqua Health Alliance will monitor and evaluate its NEMT services in accordance with Federal and State requirements as well as those stipulated in UHA's Coordinated Care Organization (CCO) Contract with Oregon Health Authority (OHA).

### RESPONSIBILITY

Compliance

Quality Improvement

### DEFINITIONS

Non-Emergent Medical Transportation Services (NEMT): Transportation to or from a source of covered service, that does not involve a sudden, unexpected occurrence which creates a medical crisis requiring emergency medical services as defined in OAR 410-120-0000 and requiring immediate transportation to a site, usually a hospital, where appropriate emergency medical care is available.

### PROCEDURES

#### General

1. Prior to entering into or amending the contract with any NEMT provider, UHA will conduct a subcontractor readiness review. To ensure that the subcontractor is ready for delegation and able to meet all Federal, State, and contractual requirements pertaining to the provision of NEMT services (Compliance Program Manual; MS3 – Member Rights; MS7 – Non-Emergent Transportation, and MS11- Call Center).
2. In the event OHA requests to see policies and procedures pertaining to the oversight of NEMT services, such documentation will be provided via Administrative Notice to the Contract Administrator within five (5) business days.
  - a. Should OHA deem the documentation deficient, UHA will remediate the findings as stipulated in Exhibit D, Section 5 of the CCO Contract.

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3. Upon request, UHA will provide OHA with, or provide access to, any of the following requested documentation so that it may assess for itself the NEMT provider's compliance with Federal, State, and contractual requirements:
  - a. Any related NEMT documentation;
  - b. Information;
  - c. Reports;
  - d. Phone call recordings;
  - e. Grievances and other submitted complaints;
  - f. Policies and procedures;
  - g. Systems; and/or
  - h. Facilities that provide or otherwise related to NEMT services.

#### Monitoring: Improving Member Satisfaction

1. Members with complaints of NEMT services may make such complaints known by contacting UHA's Customer Care and/or utilizing UHA's grievance process (CE01 – Grievances Appeals and Hearings). Both methods will document the complaints and take the necessary follow-up actions to remedy the issues. UHA also monitors Notice of Adverse Benefit Determination samples issued by the NEMT provider (CE21 – Adverse Benefit Determinations).
2. UHA or its NEMT subcontractor will conduct member satisfaction surveys of members who received NEMT services, consistent with Exhibit B, Part 2, Section 5. Follow-up member surveys will be sent to, and collected from, a minimum of ten percent (10%) of all members who were provided with NEMT rides, as required by the CCO Contract.
  - a. Survey samples will be generated from verified NEMT service records to identify eligible members who received NEMT services.
  - b. To ensure proper payment of services, the survey includes questions about if the member was a recipient of the NEMT service, the date of the service, and the amount paid or reimbursed.
  - c. To assess NEMT services, members are asked on the survey to rate on a 5-point scale how happy they were with the following:
    - i. The driver;
    - ii. Cleanliness of the vehicle;
    - iii. Safety of drive;
    - iv. Timeliness of pick-up; and
    - v. Timeliness of drop-off.
  - d. Returned responses will be reviewed by the NEMT program and UHA's Quality Improvement Department to identify trends, service concerns, and opportunities for improvement. Potential FWA-related findings will be referred to Compliance.
    - i. NEMT will make necessary improvements to services based on returned surveys.

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- ii. UHA, including the Compliance Department, will review surveys to ensure NEMT service is meeting the needs of members. Additionally, when reviewing surveys, completed ones are brought to the attention of any other UHA department as appropriate.
- iii. If service responses indicate a potential FWA concern (e.g., service not received or incorrect payment), Compliance will review the concern in accordance with the UHA Compliance Program Manual. Member contact will occur one when a formal investigation is initiated.
  1. The Compliance Department will contact the member to verify the response and gain additional details. If warranted (i.e. member substantiates information on survey), an investigation ticket will be opened to explore the matter further.

#### Monitoring: Annual NEMT Subcontractor Audit

1. Because UHA subcontracts out its NEMT services, an annual subcontractor audit is performed in accordance with the Evaluation of Subcontractors section of the Compliance Program Manual.
2. Specifically, for NEMT, the subcontractor audits will:
  - a. Validate payments, it may be necessary to take such actions, but not limited to, validating checks and completing an annual analysis matching physical health and behavioral health claims/encounters to NEMT claims/encounters.
  - b. Ensure compliance with OARs 410-141-3920 through 410-141-3965 and CCO Contract Exhibit B, Part 2, Section 5(e), which shall include, without limitation, policies and procedures for:
    - i. Member and passenger rights and responsibilities, including the right to file a grievance related to NEMT services.
    - ii. Approval of NEMT services:
      1. Verify member eligibility for NEMT services.
      2. Determine the appropriate mode of transportation for the member such that the needs of members are met (CCO Contract, Exhibit B, Part 2, Section 5(e)(5).
      3. Determine the appropriate level of service for the member.
      4. Approve or deny a member's request in accordance with health plan protocols, OARs 410-141-3834 through 410-141-3915, 410-141-3920, and 410-141-3955.
      5. Ensuring appropriate information is entered into NEMT provider's system.
    - iii. Verification of eligibility for NEMT services by screening and confirming all requests for NEMT Services align with CCO Contract, Exhibit B, Part 2, Section 5(e)(3).

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- iv. Address service modifications such that they address the safety of passengers and drivers in accordance with OAR 410-151-3955 and include modifications outlined in CCO Contract, Exhibit B, Part 2, Section 5(e)(4).
- v. Ensuing timely access for NEMT Services (CCO Contract, Exhibit B, Part 2, Section 5(e)(6).
- vi. Ensuring that NEMT provider permits members or their representatives to make requests for NEMT services on behalf of the member.
  - 1. Representatives include the member's Community Health Worker, foster parent, adoptive parent or other provider delegated the ability to schedule on behalf of the member.
- vii. Describing how the NEMT provider schedules, assigns and dispatched NEMT trips which must include the criteria outlined in CCO Contract, Exhibit B, Part 2, Section 5(e)(8).
- viii. Process for accommodating schedule changes, including unforeseen schedule changes. Accommodations must include the timely reassignment of the affected trip to, when necessary, another NEMT provider. NEMT provider shall ensure NEMT drivers do not change the assigned pick-up time without prior, documented permission from UHA's NEMT provider.
- ix. Process for notifying members of the transportation arrangements as described in CCO Contract, Exhibit B, Part 2, Section 5(e)(10).
- x. Ensuring the responsibility for determining transportation arrangements have been made are not delegated to any UHA member. Information about transportation arrangements must include the criteria outlined in CCO Contract, Exhibit B, Part 2, Section 5(e)(11).
- xi. Describing adverse weather plan, this policy must include at a minimum, staff training, methods of notification and member education.
- xii. Describing contingency and back-up plans, which must include descriptions of contingency plans for unexpected peak transportation demands and back-up plans for instances when a vehicle is late (more than fifteen [15] minutes late) or is otherwise unavailable for service. The NEMT Provider shall ensure provider vehicles arrive on time for scheduled pick-ups. The provider vehicle may arrive before the scheduled pick-up time but will not require the member to board prior to the scheduled pick-up time.
- xiii. Describing pick-up and delivery process that meets criteria outlined in CCO Contract, Exhibit B, Part 2, Section 5(e)(14).
- xiv. How NEMT provider responds to accidents and incidents, which must describe upon NEMT provider becoming aware of any accident resulting in driver or passenger injury or fatality or incidents involving abuse or

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alleged abuse by the driver to notify UHA within 1 day in order to allow for UHA to report the incident to OHA within the required two (2) business days.

- xv. Describing monitoring and documentation of services that meets criteria outlined in CCO Contract, Exhibit B, Part 2, Section 5(e)(16).
- xvi. Verifying and documenting drivers have the necessary, current State vehicle registrations and State driver's licenses at the time of service provision;
- xvii. Verifying that provider vehicles are accessible for members, including those members with disabilities, or other special health care needs (e.g., wheelchair restraints for wheelchairs, etc.);
- xviii. Conducting, and maintain documentation of, background checks on all drivers including criminal history, driving history, sex offender status, and drug testing;
- xix. Ensuring drivers and the vehicles used to provide NEMT services have undergone and met all pre-hire standards, qualifications, and training requirements set forth in OAR 410-141-3925 prior to providing services;
- xx. Obtaining and addressing accurate and timely information, for each driver, about any violation of a state drug law and the driver's driving history, including any traffic violations;
- xxi. Providing, or ensuring that drivers have attended, and documentation thereof, appropriate training for the level of services being provided (e.g., door to door vs, curbside to curbside), how to assist members with disabilities, and other special health care needs, and how to serve passengers in a culturally aware manner;
- xxii. Verifying, and documentation thereof, NEMT service subcontractors have and maintain appropriate worker's compensation, general liability, and automotive liability insurance; and
- xxiii. Auditing and documentation thereof, a percentage of daily rides for claims data, pick-up, and drop off times, appropriate level of transport, and member satisfaction.

#### Monitoring: Data Collection

1. Using OHA's NEMT Quality Assurance Guidance Document and reporting template, UHA shall provide quarterly reports to OHA about its NEMT subcontractor's call center operations. UHA will obtain data from its NEMT subcontractor, however development, validation and submission of the quarterly NEMT Quality Assurance Report is solely the responsibility of UHA as required by Exhibit B, Part 2, Section 5. The data collection and documentation shall adhere to the requirements set forth in the CCO Contract as well as OAR 410-141-3520.

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- a. NEMT subcontractor to supply a complete and accurate quarterly assurance report, at minimum, two (2) weeks in advance to UHA.
2. The NEMT Quality Assurance Quarterly Report will be provided to OHA via Administrative Notice no later than ninety (90) days after the end of each calendar quarter.
  - a. Prior to submission of this report, it shall be submitted to the Compliance Department for quality review.
  - b. UHA will validate all data and ensure that the quarterly submission meets the requirements set forth in Exhibit B, Part 2, Section 5 and OAR 410-141-3520.
3. Additionally, UHA requires its NEMT subcontractor to submit monthly Key Performance Indicators (KPIs) on call center elements: call volume, during regular business hours and after hours; call wait times, including the average wait time; calls answered, call resolution; types of calls; and percentage of call hang-ups in order to routinely monitor the quality of the call center.
  - a. Usage of KPIs will allow UHA to address issues sooner than waiting for quarterly data.

#### Improving Quality of Transportation

1. UHA uses the information obtained through its monitoring activities to work with its subcontractor(s) to improve the NEMT experience and quality for UHA members. In accordance with the External Risk Response Process section of the Compliance Program Manual, tactics used to improve quality may include, but are not limited to:
  - a. Training.
  - b. Procedural changes.
  - c. Creation or revisions of policies or procedures.
  - d. Notice of Opportunity.
  - e. Recoupment of funds.
  - f. Opportunity Plan.
  - g. Corrective action plans.

Department	Standard Operating Procedure Title	SOP Number	Effective Date	Version Number
Compliance	NEMT Quality Assurance Program & Plan	SOP-CO29	3/5/20	3