

MEMORANDUM

TO: Chair Andrea Salinas, House Health Care Committee Members

FROM: Maggie Bennington-Davis, Interim CEO and Chief Medical Officer

DATE: January 15, 2020

SUBJECT: Health Share Non-Emergent Medical Transportation Update

Chair Salinas and Health Care Committee Members,

Thank you for the opportunity to provide the committee an update on Health Share's work on Non-Emergent Medical Transportation (NEMT). As a reminder, Health Share is the Coordinated Care Organization serving the approximately 315,000 Oregon Health Plan members in Clackamas, Multnomah, and Washington counties. We are a 501(c)3 non-profit organization that was founded and continues to be governed by a collaborative of the counties, health plans, hospitals, health systems, and social service agencies serving OHP members in our community.

In the past six years, Health Share has consistently met and exceeded CCO benchmarks and expectations from the Oregon Health Authority, had excellent performance per quality metrics, turned in the highest scoring CCO 2.0 application, and has brought several key programs to the state including:

- Project ECHO
 - National telementoring program now used throughout Oregon linking primary care providers to specialists for case-based learning
- Help Me Grow
 - National model for system of coordination across early childhood and health sectors linking families and providers to resources and services for children ages 0-5 who are at risk for developmental delay
- Project Nurture
 - Model of care with proven results integrating maternity care and substance use treatment, providing prenatal care, inpatient maternity care, postpartum care, pediatric care and peer support
- Foster child medical homes
 - Advanced primary care designed specifically to support children exposed to early adversity and trauma involved with complex child serving systems such as child welfare
- TC911
 - Service coordination/outreach/wraparound program serving members who frequently call 911 for emergency medical services when other health and social services would better serve their needs

Non-emergent medical transportation (NEMT)

One area that we have been working to improve over the last few years is the implementation of our non-emergent medical transportation (NEMT) program. Currently, Health Share's NEMT program is not meeting the OHA's or Health Share's standards for reliable transportation.

As a result, we are retooling the program to address systemic issues. Our goal is to rebuild trust in the system among members, our transportation provider partners, medical providers and the community at-large by delivering the services we promise, increasing internal accountability when services are not provided, and increasing transparency of where we are in this transition process.

As the state's largest coordinated care organization serving Oregon's most diverse region, Health Share of Oregon must play a key role in building a healthy, more inclusive Oregon. Ensuring that all members have access to safe, reliable transportation to access medical appointments is critical to delivering on our mission of "partnering with communities to achieve ongoing transformation, health equity, and the best possible health for each individual." We are committed to addressing concerns to best serve our members.

About non-emergent medical transportation

Non-emergent medical transportation (NEMT) is a key element of federal Medicaid benefits. It provides members with transportation support so they can get to and from medical appointments.

In Oregon, NEMT is comprised of three distinct benefits:

- **Mileage reimbursement** for members who have access to a vehicle, but cannot afford the cost of gas (vehicle may be driven by member or a family/friend)
- **Transit pass** for members without access to a vehicle who are travelling between destinations served by public transportation
- **Vehicle provided rides** for members who are unable to use mileage reimbursement or transit services, typically due to physical or mental health conditions or because the route is unmanageable by public transit

Nationally, NEMT programs are implemented at the discretion of the states. There is wide variability in terms of what types of services are provided and to whom. Models vary from being completely managed by the state to being overseen by managed care organizations or contracted out to a statewide or regional transportation brokerage. Prior to the Oregon Health Authority integrating NEMT services into its 2014 CCO contracts, NEMT services were managed locally. Metro area services were provided by TriMet, who also partners with other agencies to provide LIFT paratransit services.

History of Health Share's NEMT program:

In 2014, when the NEMT benefit was first integrated into CCO contracts, Health Share issued a nationwide RFP to identify a skilled NEMT vendor. The process involved members of Health Share's community advisory council (CAC) as well as other partners and stakeholders. Ultimately, we awarded the contract to an experienced national NEMT vendor with local relationships. After multiple years of sustained concerns with that vendor, Health Share opted to reconfigure the program.

In 2016, Health Share began working on a design for a new and locally-based model for NEMT that would meet the unique needs of our members and community. Health Share conducted a Request for Information (RFI) process in order to identify an NEMT vendor that could operationalize the model. The results of the RFI process made it clear that the NEMT program that Health Share wanted for its members did not currently exist. As a

result, experienced transportation consulting firm GridWorks IC was selected to design and manage a custom Ride to Care program, beginning June 1, 2018.

Unfortunately, Health Share's steps to redesign this benefit did not mitigate the reliability challenges experienced with the previous vendor. Health Share has worked closely with GridWorks over the past year to ensure that it meets Health Share's expectations, including provision of on-site oversight and technical assistance. As of this fall, this partnership did not achieve the goals or progress that we had hoped for.

After continued reliability and performance issues with the current Ride to Care vendor, Health Share announced it will transition management of the Ride to Care program to CareOregon, one of Health Share's founding partners who has experience managing NEMT programs in other areas of the state.

CareOregon will take over management of Health Share's NEMT program on March 1, 2020.

Key recent events:

- **June 2018:** GridWorks began operating the Ride to Care program. There were significant issues with its operations, but the safety concerns we had with the previous vendor were nearly entirely resolved. Health Share supported GridWorks through this start-up phase to address concerns with operations.
- **January 2019:** GridWorks was unable to manage member demand, resulting in financial difficulties. Health Share infused additional capital, provided technical support, and put GridWorks on a corrective action plan to meet quality and policy requirements.
- **Spring 2019:** Transportation provider partners reported that they had not been paid for services, resulting in declining relationships between GridWorks and its transportation network.
- **Summer-Fall 2019:** Increased number of member complaints about late or missed rides were reported to the Oregon Health Authority, resulting in OHA putting Health Share on a corrective action plan in October 2019. Health Share responded in Nov. 1, 2019 and has since been working with OHA to address concerns.
- **December 2019:** GridWorks alerted Health Share that it was in debt and faced insolvency. On Dec. 18, 2019, GridWorks entered into a court ordered receivership, where its assets are being managed by Hamstreet & Associates as we transition a new NEMT vendor. To ensure that GridWorks stays afloat during this transition period, Health Share infused additional capital and paid transportation providers owed for services that had not yet been paid for October and November 2019.

[Transitioning to a new model to better serve members and our transportation network](#)

This summer, Health Share began doing research into what improvements would be needed for our NEMT program to best serve members and our transportation provider partners. To ensure improvement plans meet the needs of members and providers, Health Share and CareOregon:

- Connected with OHP members and stakeholders about NEMT user needs
- Held four listening sessions with transportation providers to understand issues from their perspective
- Audited the current Ride to Care contractor's operations to identify improvements

As a result, Health Share determined that a new NEMT model was needed to serve members:

Health Share of Oregon Accountable to the Oregon Health Authority for successful management of NEMT services for its members.		
CareOregon Responsible for management of the NEMT benefit, including facilitating contractor collaborations and escalating concerns raised by members or transportation providers to ensure timely resolution.		
Call Center <ul style="list-style-type: none"> • Take member calls • Perform assessment to determine which service is a best fit for the member (mileage reimbursement, transit pass, hired driver rides) • Input trip data • Recieve and document complaints from members and share with CareOregon 	Dispatch Manager <ul style="list-style-type: none"> • Assign rides to transportation providers 	Network Manager <ul style="list-style-type: none"> • Manage contracts with transportation providers, including ensuring that they meet credentialing and safety standards • Recieve and document complaints from transportation providers and share with CareOregon

CareOregon, the state’s largest provider of OHP services and a founding Health Share member, will take over management of the NEMT program on March 1, 2020. It will be responsible for managing vendors providing call center, dispatch and network management services and play a key role in escalating concerns from members and transportation providers to Health Share leadership.

One of the core issues with the previous NEMT models has been the complaint and grievance process. We believe that past efforts to centralize the complaint process within the organization responsible for complaint resolution and overall system success created a lack of accountability and transparency.

This new approach positions vendors in each of the distinct roles as an advocate for the audience they serve. The call center will be motivated to take/document and report complaints from members to CareOregon who can take a systemwide approach to addressing concerns raised. Likewise, the Network Manager is accountable to its contracted transportation partners, and even if it is able to resolve complaints within its own operations, it will be responsible for reporting those issues to CareOregon as part of our effort to operate in a manner that meets our standards for transparency and accountability.

Additionally, Health Share has taken a more active role in determining payment structures for transportation providers. As of this month, the transportation provider network will be moved to a twice monthly payment structure. This is part of our overall effort to rebuild trust with transportation partners, especially those who experienced financial difficulty due to lack of payment.

Finally, Health Share will continue to work with OHA on its corrective action plan. Since being placed on a corrective action, Health Share has directed GridWorks to focus on core operations, including adding significant staffing resources into the NEMT call center. Our teams have also been in regular contact with the Disability

Services Advisory Councils and State Ombudsman to understand the issues and priorities impacting their communities. Health Share has also begun additional monitoring of NEMT system performance for some of our most vulnerable members, such as those in long-term care & services and supports).

While we have seen improvements in the NEMT system performance in the past two months and anticipate continued improvements, it will be challenging to meet all of our goals in the 1st quarter of 2020 due to both the impacts of Gridworks being placed into receivership as well as transition activities to new systems and partners. While the transition activities may cause limited periods of disruption as we move through the first quarter, every effort is being made to mitigate these. These transitions are of course necessary due to the financial collapse of GridWorks, but are also strategic, long-term changes to improve the operations and accountability for providing the NEMT benefit to our members. We are building in expectations into contracts with transportation providers around on-time performance standards, which go into effect on Feb. 1, 2020, and will continue to monitor overall progress toward meeting state standards.

Thank you for your continued support of building a strong, equitable Oregon. We look forward to continuing to work alongside you toward our common goal.

Sincerely,

Maggie Bennington-Davis
Interim CEO and Chief Medical Officer
Health Share of Oregon