Medicaid Mobility Transformation

Background:
Ohio’s non-emergency medical transportation (NEMT) system is outdated, inefficient and at times ineffective. Currently, each county department of job and family services (CDJFS) is responsible for coordinating NEMT within its jurisdiction. This arrangement creates limitations based on geographic borders and sometimes results in inconsistent delivery of services from county to county, putting Medicaid recipients at risk for not being able to access necessary medical services.

Ohio must develop a NEMT system that provides necessary transportation services, as required by CMS, in a manner that is reliable, efficient and accountable. Addressing the problems with NEMT services also aligns with other initiatives to improve health and human service transportation statewide.

Transformation Strategy:
Across state agencies, initiatives are underway to improve how transportation services are provided to Ohioans. Current transportation programs are administered by a multitude of organizations, including local, county, and state government, transportation authorities, community organizations, not-for-profits, and others. Transportation programs are critical to ensure Ohioans have access to jobs, healthcare, education, social services, and other daily activities. However, while some transportation programs and services are available to the public, many are designed to serve a particular need or population segment. The result has been a statewide transportation system that is disjointed, disconnected, and inefficient.

Through three primary initiatives, the State of Ohio is working to make it easier to match people with the transportation services they need. At the same time, agencies are working to use transportation resources more efficiently and consistently, while also addressing inconsistencies in service availability across the state.

Promote Regional Coordination
Transportation services in Ohio are operated by hundreds of public and human services agencies. All of these services are necessary to meet the diverse transportation needs of Ohioans, but without coordination they can become siloed and inefficient. The result is redundant services in some areas and gaps in others. The Ohio Department of Transportation is leading efforts to improve local and regional coordination of public and human services transportation – seeking to ensure that transportation needs are addressed and that available resources are used efficiently.

Align State Policy
At the state level, 14 agencies are involved in delivering or contracting for transportation services. Each of these agencies has its own policies and standards related to driver screening and training, vehicle requirements, customer eligibility and usage and costs. Differing policies often make coordination of services impossible by prohibiting one agency’s clients from riding on another agency’s vehicle, even if it is going where the individual needs to go. State agencies are working together to review current standards and establish new standards that can be adopted by agencies statewide. This effort will cut
red tape for transportation providers who can provide services under more than one state program, and enables coordination for Ohioans who utilize these services.

**Enhance Accountability and Consistency**

In June 2017, the Ohio General Assembly passed, and Governor John Kasich signed, House Bill 49 – Ohio’s biennial budget bill for FY 2018-2019. Contained in this bill was a provision transitioning responsibility for Ohio’s NEMT services from the state’s current county-based system to a state-based brokerage model. This provision is an acknowledgement that Ohio’s current system is outdated, resulting in inconsistent delivery of services throughout the state, with limited accountability for how NEMT dollars are being spent. The goal of this initiative is to more fairly and consistently provide services throughout the state. Only those NEMT services currently provided through the county system will be impacted by this initiative; waiver transportation services and services provided by managed care plans will not change.

**Progress to Date and Impact:**

With the implementation of a state-level brokerage system, Ohio will join approximately 29 other states in implementing this type of model for the provision of NEMT services. Under this new model, Ohio will contract with one or more third-party transportation brokers to manage NEMT services. The broker or brokers will develop and maintain a provider network, verify Medicaid eligibility for NEMT services, determine and authorize the appropriate cost-effective and medically necessary mode of transportation, and dispatch an appropriate vehicle. Ohio Medicaid will pay the transportation broker a monthly capitation payment per individual to cover the cost of administering the program and paying providers.

The goal is to provide consistent transportation service for Medicaid members and more efficiently arrange for their transportation needs. Because Ohio is a large and diverse state, the model will also be implemented with flexibility to account for regional variations in transportation needs.

States must ensure necessary transportation for Medicaid individuals to and from medical providers (42 CFR § 431.53(a)). Transportation costs include expenses for transportation (e.g., NEMT) and other related travel expenses determined to be necessary by the State Medicaid agency to secure medical examinations and treatment for individuals (42 CFR § 440.170(a)(1)). States must use the least costly mode of transportation if multiple modes are available, including maximizing available free resources. In the summer of 2016, in preparation for the biennial budget process, Ohio evaluated the budget savings that would result from transitioning its CDJFS-administered Medicaid fee-for-service NEMT services to a brokerage system.

The Executive Budget, which was presented in January and introduced by the General Assembly as House Bill 49, contained language in sections 307.20 and 333.130 allowing the Ohio Department of Medicaid to request the transfer NEMT funds from the Department of Job and Family Services (JFS) to ODM, for the purposes of ensuring access to a non-emergency medical transportation brokerage program established by ODM. During consideration of the budget – from January through June 2017 – ODM met with various stakeholders engaged in NEMT to hear about how the system currently works, and opportunities for improvements.
In October 2017, following passage of House Bill 49, the Ohio Department of Medicaid issued a Request for Information as work began to implement the budget provision and develop a comprehensive NEMT strategy. Thoughtful and constructive feedback was received by nearly 50 respondents representing the breadth and diversity of stakeholders involved in health and human services transportation, including community organizations, health systems, trade associations, managed care plans, state agencies, brokers, private transportation providers, public transit, and county job and family services agencies. Responses were received from individuals and organizations throughout the entire state. With this input from stakeholders, and research on transportation programs in other states, ODM determined that a brokerage system allows the opportunity to maximize federal cost-sharing, lower NEMT costs and improve access to high quality transportation services for Ohio Medicaid members.

- **Enhances Access while Allowing Flexibility for Community Variation.** Currently, the Ohio Department of Medicaid has limited insight into how NEMT services are being provided throughout the state. Without consistent, reliable data from counties on what transportation services are being provided and to whom, the state is unable to look holistically at the NEMT service to identify redundancies in service and places where there are gaps and additional resources are needed. For individuals in areas where transportation resources are limited, transition to a new model for NEMT services will mean increased access to fulfill transportation needs. NEMT services will continue to be a benefit for Ohio Medicaid members, and existing transportation providers will need to continue to engage in this important work – albeit under a new model.

- **Increases Accountability.** Timeliness, no-shows, late arrivals, safety issues, poor customer service, and scheduling problems are frequent criticisms of transportation services. Today, ODM does not have reliable data on any of these issues that can be used to make informed decisions for improvement. By moving to a brokerage model, the state will be able to monitor and address service issues with providers, with the goal of better service for individuals who utilize NEMT. At the same time, the state will be able to appropriately monitor the usage and cost of NEMT services.

- **Supports Legislative Priorities.** The Ohio General Assembly has been clear in its goal that Medicaid services be provided efficiently and that the Ohio Department of Medicaid act as a good steward of taxpayer dollars. In addition to the enhanced oversight offered by a state-level brokerage model, improvements to the state’s NEMT model can also stretch state dollars further. By moving responsibility for funding NEMT to the Ohio Department of Medicaid, Ohio can claim these services at a Federal Medical Assistance Program (FMAP) match rate, which is higher than the current Ohio Department of Job and Family Services match rate of 50 percent and results in $6.8 million in estimated annual savings to the state.