MaineCare Services
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Department of Health and Human Services

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MaineCare Non Emergency Medical Transportation (NEMT) System Redesign

MAC Subcommittee on Transportation

April 5, 2011

All documents and materials concerning the NEMT project reflect MaineCare's current thinking and are subject to change. No materials on NEMTweb page, distributed and discussed at meetings or sent in emails or mailings are binding in any way concerning the future procurement process.

Objectives & Agenda

Objectives:

- Provide overview of the Department's choice to move forward with a single, statewide risk-based Prepaid Ambulatory Health Plan (PAHP) model
- Provide clarification on communications to date
- Discuss plans for future stakeholder engagement in the process

Agenda:

- Introductions
- Background
- Goals
- Selection of the risk-based PAHP option
- Overview of risk-based PAHP model
- Tentative timeline for implementation of new system
- Planning discussion regarding:
  - April 25 Stakeholders Forum
  - Member focus group

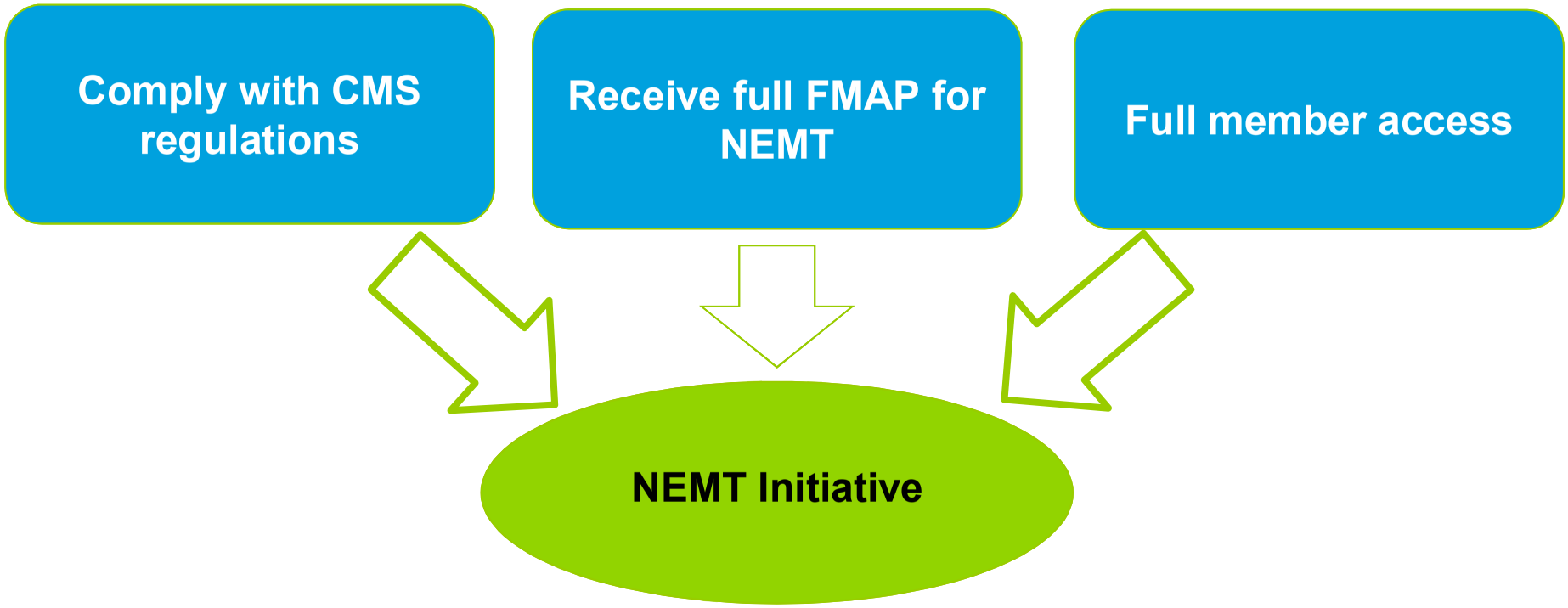
Initiative Background

- MaineCare has worked with the MAC Subcommittee on Transportation and the Full Service Regional Transportation Providers (FSRTPs) over the past year to submit a 1915(b) waiver application to CMS with the intent to:
  - Maintain the current system structure
  - Claim Federal Medical Assistance Percentage (FMAP) for all NEMT services
- CMS notified MaineCare in November 2010 that the waiver application was denied and presented Maine with options for system redesign. The Department was asked to reply by January 31, 2011.
- The Department requested an extension until February 28, 2011, in order to brief the new administration on the status and options for NEMT.
- The Department decided to restructure NEMT as a single, statewide risk-based PAHP.
- To accomplish this goal, the NEMT redesign team is working to develop an RFP for issuance in June, 2011 for a target January, 2012 implementation.

Aspects of the current system are out of compliance with CMS regulations.

- FSRTPs acting as both broker and provider:
  - Potential conflict of interest: FSRTPs have an incentive to self-refer trips, rather than selecting the most cost effective mode that meets the member's needs.
  - CMS allows for payments for direct transportation to be made to a business agent that will then pay the claims; however, FSRTPs do not qualify as business agents as they provide and arrange for the service.
  - Therefore, payments for the cost of the trips must go to the direct transportation provider, whether an agency, volunteers or family and friends. Payments cannot go to the FSRTP in cases where the FSRTP did not deliver the transportation.
- Problems with Claiming FMAP:
  - The state cannot claim FMAP for the administrative fees that go to the FSRTPs, they can only claim the 50% administrative rate.

Goals of Initiative: Why a Risk-based PAHP?

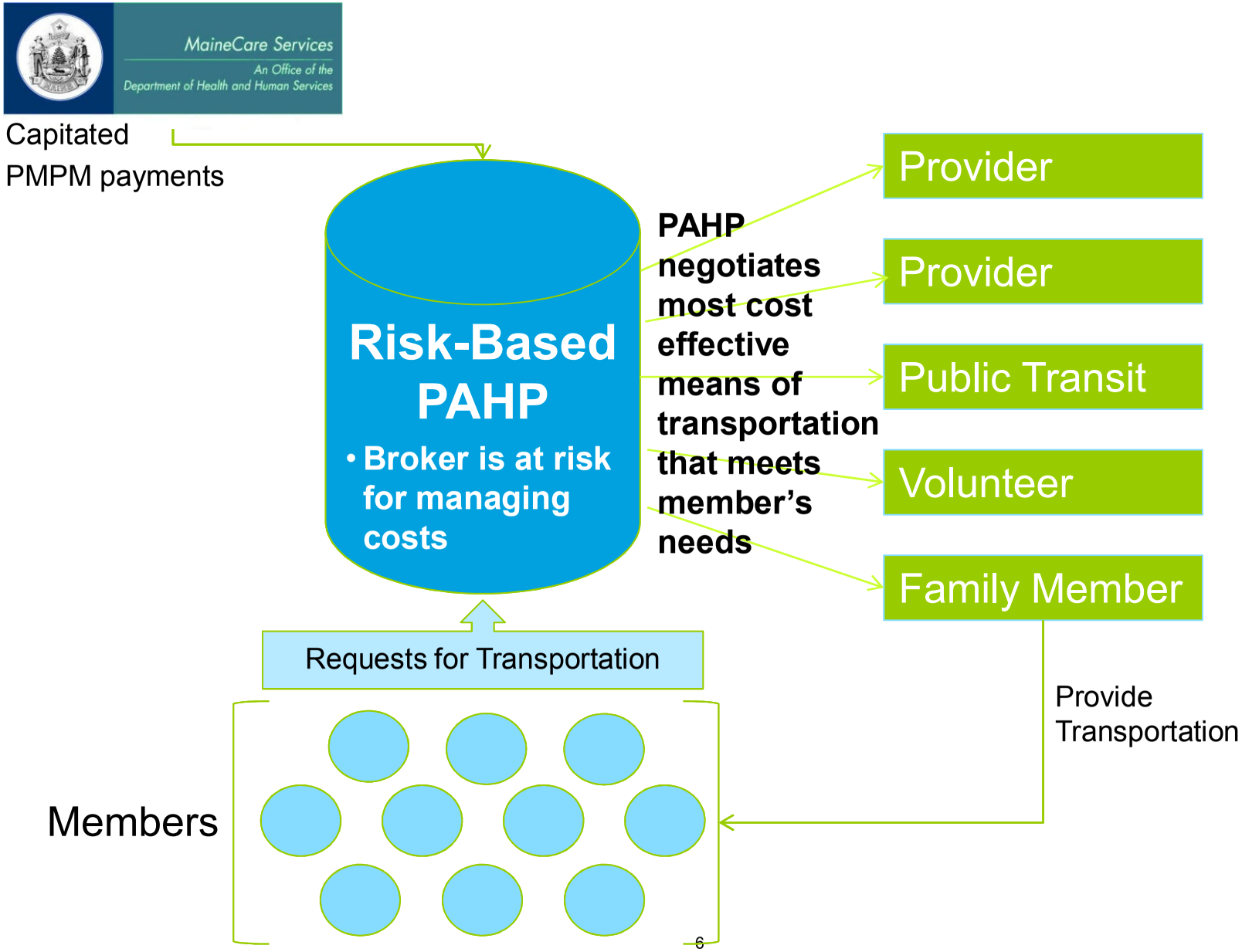


A risk-based PAHP is the only option that meets all 3 goals for OMS.

Why did the state select this option over the other options that CMS presented?

CMS Options	Comply with CMS regulations	Receive full FMAP for NEMT	Full member access
Risk-based PAHP	✓	✓	✓
Non-risk PAHP with regional contracts	✓	X 50% rate for administrative portion of services	X Very difficult for FSRTPs to meet 24/7 PAHP access requirements
State Brokerage with State Plan Amendment	✓	X 50% rate for administrative portion of services	X Family, friends & volunteers would have to enroll as providers
Maintain current system w/ all svcs matched at administrative rate	✓	X 50% rate for all services	✓ Though system would still not provide 24/7 access

How does a risk-based PAHP system function?



Initiative High-Level Timeline

March 2011	**NEMT Initiative Launched**
June 2011	**RFP Issued**
January 2012	**Implementation**

Stakeholder Engagement

- April 25 Stakeholder Forum, 9-12, Augusta Civic Center
  - Main Objective: Gather feedback, suggestions and concerns from interested parties
  - Discussion: format

- May Member Focus Group
  - Discussion: Start with Managed Care Member Services Committee
  - Inclusion of others?