DOJ SETTLEMENT AGREEMENT – PROCESS DOCUMENT
16.2 Transportation On Time Performance (OTP) Measure

DATE CREATED 1/11/23	**CREATED BY Aaron Moore**
VERSION NO. 002	**PROCESS OWNER Aaron Moore**
DATE OF LAST REVISION: 8/30/23	**LAST UPDATED BY: Aaron Moore**

INSTRUCTIONS

1. **'I. INTRODUCTION'** – This section is utilized to provide detailed information about the document and the contents that is contained within the document. Information referenced in this document will provide details needed to understand the documented process and its deliverables.
    a. **Purpose:** Provide the purpose of the document to include specific detail about what is being addressed with the development of this process
    b. **Scope:** This section should outline the deliverables and/or objectives of this process to provide a method to measure success
    c. **Document Management:** Describe how the document will be tracked, stored, and distributed.
    d. **Compliance:** Provide all DOJ Provision and Compliance ID #s that are relevant or will be addressed by implementing the process on this document including language.
    e. **Roles & Responsibilities:** Identify the role of all individuals involved in the process and define their responsibilities of each individual.
2. **'II. CHANGE CONTROL'** – This section will provide a description of the systematic approach to managing changes made to the process as well as ensuring that no unnecessary change or revisions are made that disrupt services or compliance.
    a. **Process Description** – Provide a detailed description about the process and what the process will address (i.e. developed as a monitoring tool, lower budget expenses, etc.)
    b. **Input/Trigger** – A process input/trigger describes what initiates the start of the process. Provide detailed information about what input is needed to start the process (i.e. intake process is initiated, a new service is begun, payment is received, etc.). The input/trigger should provide an explanation for the necessary tasks/steps identified in the process.
    c. **Outputs/Measures of Success** – A process output/measure of success describes the expected end product of a process (i.e. report, improved performance metrics, etc.). Provide a statement that describes what the expected outputs/measure of success of the process should be. The description of this output should allow for the development or tracking of measures of success.
    d. **Boundaries** – Process boundaries identify where the process starts and when it ends, it also identifies what is included and what is not included in the process. Boundaries also identify areas of intersect with other processes and activities. Provide any identified boundaries (i.e. initiation, closure, reporting cadence, frequency of process, etc.) in this section. Boundaries could include the intersection of where the process ends and the reporting process begins that includes the findings of the process.
    e. **Points of Control** – Points of Control within a process identifies any action or event that could "block" the implementation of the process. Provide any foreseen obstacles that may impact successfully implementing the documented process

DOJ SETTLEMENT AGREEMENT – PROCESS DOCUMENT

16.2 Transportation On Time Performance (OTP) Measure

f. **Version Control** – Version Control will be utilized to track changes and guide naming conventions of process documents. Documents should follow the below nomenclature:

Program Area_Purpose_Ver_Version# (DQV_DOJ DQ Assessment_Ver_001)

3. **'III. Reporting'** – List of reports that are generated utilizing the data from this process
4. **'IV. Process'** – Provide detailed step-by-step instructions for implementation/execution of process.
5. **'V. Measure Documentation'** – Description of the measure for reporting documentation
   a. **Measure Language** – Written in plain language, the measurable outcome is described here. This presents what the team wants to see happen at the individual, provider, or state level.
   b. **KPA PMI**? – A yes or no indicator to show whether this measure is a Performance Measure Indicator (PMI) that will be monitored in the Key Performance Area Workgroups (KPAs).
   c. **Numerator** – Numerator is described here, representing a subset of the same number described in the denominator.
   d. **Denominator** – Denominator is described here, representing the total number of applicable cases.
   e. **Target** – The goal, such as a count or percentage, for which the results should fall at or above.
   f. **Target Date** – The date or timeframe by which the target should be met (e.g., based on annual state fiscal year).
   g. **Baseline** – A period of benchmark data available prior to monitoring.
   h. **Population** – A description of the counts in the denominator (e.g., individuals on the DD waivers, all service providers).
   i. **Regional Breakdown**? – A yes or no indicator to show whether a regional breakdown of the data is possible for this measure.
   j. **Office of Clinical Quality Management Recommendation** – Language from the Office of Clinical Quality Management that provides guidance for actions needed.
   k. **Recommendation Mitigation & Timeline** – The time period and actions that will be taken to address the recommendation.
6. **'VI. Verification'** – Provide all verification or validation process that needs to take place to ensure that the process is valid.
7. **'VII. Continuous Quality Improvement (CQI)'** – Provide a detailed step-by-step process describing what will be done to monitor and improve process as time progresses.
8. **'VIII. Glossary of Terms'** – Contains definitions of terms used to describe process activities and requirements

I. INTRODUCTION

PURPOSE	The purpose of this document is to describe the data certification and validation process utilized by DMAS staff and its contractor(s) in association with the Encounter data. This data is in relation to the DMAS Medicaid Fee for Service (FFS) Non-emergency Medical Transportation (NEMT) program. The data and processes are only related to IDD waivered trips. This document is intended to provide an in-depth overview of the process and procedures utilized when collecting, verifying and analyzing the Encounter data.
SCOPE	The primary objective is to demonstrate that DMAS staff has developed and follow appropriate process and procedures for determining the OTP or On Time Performance data utilizing the Encounter data in relation to the Medicaid FFS NEMT transportation brokerage. The goal is 86% on time performance for this measure.

DOJ SETTLEMENT AGREEMENT – PROCESS DOCUMENT

16.2 Transportation On Time Performance (OTP) Measure

DOCUMENT MANAGEMENT	All process documents will need to utilize approved process templates provided by DBHDS. Process documents will be saved as .pdf documents before distributed. All process documents will be stored in a centralized document library. Any revisions or updates to the document will need to be approved and documented for effective revision and/or document management. Naming conventions for versioning will be strictly enforced.
PROVISION	III.C.8.a.-The Commonwealth shall provide transportation to individuals receiving IDD waiver services in the target population in accordance with the Commonwealth's IDD Waivers.
COMPLIANCE INDICATORS	16.2	At least 86% of DD Waiver recipients using Medicaid non-emergency medical transportation (NEMT) will have reliable transportation.

ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITY
TMSU Manager	The TMSU Manager will be responsible to oversee and provide the approval of the data validation process.
Data Systems Analyst	Is responsible to collaborate with the Transportation Management Services Unit (TMSU) Manager to aggregate, arrange, analyze and confirm the Encounter data submitted in association with the FFS NEMT Medicaid Transportation Broker. An Encounter data summary report will be produced and integrated into the Program Operations FFS NEMT On-time Performance (OTP) Report. The Data Systems Analyst monitors the weekly and monthly Encounter Processing System (EPS) Encounter submission reports and the NEMT encounter broker reports for any errors.
Medicaid FFS NEMT Transportation Program Broker	Is responsible for the weekly and accurate submission of encounter data to DMAS via EPS, or the Encounter Processing Solution. The transportation broker collects, verify and certify the Encounter data associated with the DMAS Medicaid FFS NEMT Transportation Program. Certification means that but the data analysts that are employed by the contracted NEMT broker uses the manual to verify and upload all of the pertinent Encounter data and the DMAS Data Systems Analyst will check and verify the data that has been uploaded and send notifications to the NEMT broker staff when she sees errors or fails. The manual is attached to this document for reference and a complete overview of the certification process.

II. CHANGE CONTROL

PROCESS DESCRIPTION	This process outlines the process and procedures of extracting the encounter data for the On Time Performance measure and creating the reports. Weekly the Medicaid FFS NEMT Transportation Broker will upload, review, certify and submit the Encounter data to the EPS system. The encounter data from EPS is then uploaded into the data warehouse at DMAS. Then a series of Teradata SQL queries are run to create the reports that are then compiled into an Excel workbook for the current month.
INPUT/TRIGGER	The primary trigger for this process is the certification and submission of the Encounter data by the Medicaid FFS NEMT Transportation Broker. This data will be certified and submitted on a weekly basis by the Transportation Broker. The Medicaid FFS NEMT Transportation Brokerage Contract Manager will work with the DMAS Data Systems Analyst if any errors are found and to correct them quickly.
OUTPUTS/MEASURE OF SUCCESS	The outputs or measures of success is to capture accurate encounter data in the OTP data reports. Samples from each report are checked for accuracy and formatting via Medicaid Information Management System or the EDWS data warehouse. Overall benchmark is outlined in the language of the associated compliance indicator. The indicator is as follows: At least 86% of DD waiver recipients using Medicaid non-emergency transportation (NEMT) will have reliable transportation.
BOUNDARIES	See Input and Trigger summary. The process will be initiate on a quarterly basis, a month after the end of the previous quarter.

DOJ SETTLEMENT AGREEMENT – PROCESS DOCUMENT

16.2 Transportation On Time Performance (OTP) Measure

POINTS OF CONTROL	The main constraints that could hinder the process as outlined below hinge upon the Medicaid FFS NEMT transportation broker to certify and submit the Encounter data in a timely manner. DMAS TMSU staff will coordinate with the brokerage staff responsible for the certification of the data to ensure that it is submitted on a regular basis in preparation for the quarterly and annual validation processes.

VERSION	DATE	DESCRIPTION OF CHANGE IMPLEMENTED	COMPLETED BY
16.2 Transportation On Time Performance Measure__VER001	1/11/2023	Initiation of process	Aaron Moore
DOJ Process Template_VER_002	8/30/2023	Transferred to new template. Added definitions (Section VIII), inserted narrative throughout to clarify acronyms, and filled in narrative for Section V. There were no changes to numerator/denominator and no changes to the process, methodology, or calculations.	Aaron Moore

III. REPORTING

REPORTING TOOL/MECHANISMS			
Report Name	OTP report	**Data Source**	EPS/EDWS Data warehouse

IV. PROCESS

OVERVIEW

STEP#	PROCESS STEPS	SOURCE OF RECORD	APPROVAL REQUIRED	APPROVER

1.	SQL queries are updated with the current month of data needed. This process is completed 3 times to pull the quarter of data that is requested, example (October, November and December)	Teradata SQL	n/a	n/a
	Performed by: Data Systems Analyst			
2.	Queries are submitted for each measure and data is validated. See related, attached OTP queries document for specific queries. The definitions of the specific queries are provided below for reference. • Provider Query A Leg – This query is run, extracting encounter data related to the OTP of the provider in relation to the first leg of the trip to pick up the member (e.g. picking up a member from their place of residence of location of trip origin). • Provider Query B Leg - This query is run, extracting encounter data related to the OTP of the provider in relation to the second leg of the trip to pick up the member (e.g. dropping a member at their destination). • Provider Query A Leg VD - This query is run, extracting encounter data related to the OTP of volunteer drivers (hence VD in the query title) in relation to the first leg of the trip to pick up the member (e.g. picking up a member from their place of residence of location of trip origin). • Provider Query B Leg VD - This query is run, extracting encounter data related to the OTP of volunteer drivers in relation to the second	EDWS Data warehouse	n/a	n/a

leg of the trip to pick up the member (e.g. dropping a member at their destination).

- Provider Query A Leg GR - This query is run, extracting encounter data related to the OTP of drivers for facilities or other locations that are transporting their own members, using their fleet vehicles and are reimbursed for gas/fuel (hence GR in the query title) in relation to the first leg of the trip to pick up the member (e.g. picking up a member from their place of residence of location of trip origin).

- Provider Query B Leg GR - This query is run, extracting encounter data related to the OTP for facilities or other locations that are transporting their own members, using their fleet vehicles and are reimbursed for gas/fuel (hence GR in the query title) drivers in relation to the second leg of the trip to pick up the member (e.g. dropping a member at their destination).

- Provider Query A Leg CSB - This query is run, extracting encounter data related to the OTP of drivers for Community Service Boards that are transporting their own members, using their fleet vehicles (hence CSB in the query title) in relation to the first leg of the trip to pick up the member (e.g. picking up a member from their place of residence of location of trip origin).

- Provider Query B Leg CSB - This query is run, extracting encounter data related to the OTP of drivers for Community Service

	Boards that are transporting their own members, using their fleet vehicles (hence CSB in the query title) in relation to the second leg of the trip to pick up the member (e.g. dropping a member at their destination). • Provider Query Bus Pass – This query is run, extracting encounter data related to the number of trips completed utilizing public transit, being tracked in relation to bus passes being used and validated.			
	Performed by: Data Systems Analyst			
3.	Reports are created and formatted into an excel workbook.	Excel	n/a	n/a
	Performed by: Data Systems Analyst			
4.	Reports are sent to the TMSU manager to create an encounter data summary report that will be produced and integrated into the Program Operations FFS NEMT On-time Performance (OTP) Report	Excel		
	Performed by: TMSU manager			

V. MEASURE DOCUMENTATION

Measure language	At least 86% of DD Waiver recipients using Medicaid non-emergency medical transportation (NEMT) will have reliable transportation.
KPA PMI?	No
Numerator	# of On time trips provided to individuals with ID/DD waivers
Denominator	# of NEMT trips provided to individuals with the ID/DD waiver
Target	86%
Target Date	Annual state fiscal year
Baseline	n/a
Population	Medicaid waiver recipient using NEMT
Regional Breakdown?	No

Office of Clinical Quality Management Recommendation	N/A
Recommendation Mitigation & Timeline	N/A

VI. VERIFICATION

VERIFICATION, VALIDATION, AND TESTING PROCESS

Data set validation was performed by analyzing the Encounter data extracted from the MMIS system and the EDWS data warehouse. The data is exported in an Excel format and is housed in several Excel Spreadsheets that are extracted by month on a quarterly basis. The trip data was analyzed and summarized in accordance with established definitions of "late trips," and "on-time trips."

The data analyst reviewed the data from the following Microsoft Excel files:

- Jan 2023 DOJ On Time Performance Data – raw data.xlsb, and
- Feb 2023 DOJ On Time Performance Data – raw data.xlsb, and
- Mar 2023 DOJ On Time Performance Data – raw data.xlsb

The data analyst reviewed the data and process document and identified errors in the data. The data error was a result of the manual transfer of data from the raw data spreadsheets to the summary spreadsheet. The Data Analyst automating this with the incorporation of pivot tables in the reporting and tracking process. Also, since the terminology on the raw data tables is more familiar to transportation operations staff, and are not intuitive to non-operations staff, it was recommended to update the titles of the tabs on the raw data table to make it easier for an analyst to navigate the data in the future. The raw data was corrected and data was able to be validated and determined reliable.

With the incorporation of the mitigation steps outlined above, future data should remain reliable and valid.

Therefore, the data and processes are reliable and valid for the identification of quality improvements and risk mitigation. See the Attestation dated 9/22/2023 "16.2_NEMT_Transportation_Attachment_B_9.22.2023.docx".

VII. CONTINUOUS QUALITY IMPROVEMENT (CQI)

CQI PROCESS		
STEP#	**PROCESS STEPS**	**PERFORMED BY**
#	(Describe the step required to perform action)	(Identify the role/job title of individual performing this task)
1	The Medicaid FFS NEMT Transportation Brokerage Contract Manager, working in conjunction with the DMAS Data Systems Analyst will analyze and compare the Encounter data submitted with the data available via Tableau on a weekly basis at least to ensure that erroneous data submissions are kept to a minimum and to assist the TMSU Manager and Medicaid FFS NEMT Transportation Broker in addressing any recurring provider issues	Medicaid FFS NEMT Transportation Brokerage Contract Manager, DMAS Data Systems Analyst

VIII. GLOSSARY OF TERMS

Term	Definition
	Compliance Indicator 16.02 (III.C.8.a): At least 86% of DD Waiver recipients using Medicaid non-emergency medical transportation (NEMT) will have reliable transportation. For the purposes of this measure, "NEMT Trips" will be defined as Medicaid Fee-For-Service (FFS) non-emergency medical transportation provided to individuals enrolled in either the BI, FIS, or CL Waivers (collectively known as the DD waiver). **For the purpose of this measure, "reliable" will be defined through the On Time Performance Measure indicators described below:** **Definition and source of data for On Time Performance Measure** Medicaid FFS Encounter Processed Data received from DMAS' FFS NEMT Broker, Modivcare, will be the sources of data used to determine NEMT Trips subject to this measure based on the rules below. Consistent with DMAS's FFS NEMT Contract, "On Time Performance" will be determined using the measures and rules defined below.
On-time Performance	

NEMT Trip types to be taken into consideration for On Time Performance
1. NEMT Trips assigned to Transportation Providers by DMAS's NEMT Broker (currently Modivcare)
2. NEMT Trips assigned to Volunteer Drivers (VD)

NEMT Trips that will **not** be taken into consideration for On Time Performance
1. Gas Reimbursement paid to family or friends
2. Trips assigned by Modivcare to CSBs and Facilities who transport the Members they serve or for whom they are responsible to their DD waiver services and bill Medicaid for their services.
3. Trips with an "actual" pickup or drop off time that is calculated to be over three hours. This is considered a manual mistake of the driver not utilizing military time on manual manifests. Currently, not everything is GPS and some Transportation Providers still use manifests (where the mistakes indicated above are made). Until such time that GPS is the full use, we want to report all trips regardless of collection source. DMAS continues to make ongoing efforts to move towards 100% GPS usage for designated providers. DMAS anticipates that this will be in place by September 1, 2022 for I/DD members.

Scheduled Pick Up Time (starting point) compared to Actual Pick Up Time
Pick up: To be considered "On-Time", DD Members must be *picked up* within the contract window of up to 15 minutes before and up to 15 minutes after the scheduled pick up time.
   o For example, a specific leg of an NEMT trip assigned to transportation provider is scheduled for pick up at 10:45am. It will be considered On Time if the DD waiver Member's actual pick up time is between 10:30am and 11:00 am

Arrival/Drop Off: To be considered "On Time," DD Members must *arrive* within up to 15 minutes after their scheduled appointment time
   o For example, a specific leg of an NEMT trip is assigned to a Transportation Provider(s) or Volunteer Drivers that was scheduled to arrive at the day program at 11:00 am. It will be considered On Time if the DD waiver Member is dropped off at the facility prior to the scheduled appointment time up until 11:15am.
- The first leg trip that is up to 15 minutes after the scheduled drop off time will be considered On Time with a separate percentage calculation with and without the 15 minutes.

Scheduled Return Trip from the Facility or Supported Employment for return to starting point of trip (i.e. residence or group home)
The DD Member who is picked up on or after the scheduled return time will be considered on time for return.

- Current "Will Call" return trips are considered on time if the DD Member is only picked up with an unscheduled return time.
  - As of December 2021, a new process was put in place. The DMAS NEMT Broker is notified by the Member when they are ready for pick up. The NEMT broker is able to submit "call in time" on the encounter. The trip will be considered On Time if the member is picked up 45 minutes or less from the time the NEMT broker is notified by the Member that they are ready. Any encounter date or date of trip from prior to that implementation (December) may deviate from new rule.