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Operating Procedures Manual

Non-Emergency Transportation (NET) Services

for

Nevada Medicaid

Table of Contents

Table of Contents **1**

Purpose **2**

Use and Format **2**

MTM Contact Information **3**

MTM Contractual Responsibilities **4**

1.0 Member Rights and Responsibilities **5**

2.0 Health Insurance Portability and Accountability Act (HIPAA) Confidentiality **8**

3.0 MTM's Culturally and Linguistically Appropriate Services (CLAS) Standards **9**

4.0 Network Management **10**

Network Management Policies andProcedures 15

5.0 Customer Service **72**

Customer Service Center Policies and Procedures 75

6.0 Care Management **125**

Care Management Policies and Procedures 128

7.0 Marketing Communication **141**

Marketing Communication Policies and Procedures 142

8.0 Quality Management **151**

Quality Management Policies and Procedures 157

9.0 Claims **182**

Claims Policies and Procedures 184

10.0 Information Technology **226**

Information Technology Policies and Procedures 243

11.0 Glossary of Terms **310**

DRAFT

Purpose

To provide a written tool that informs the Nevada Division of Health Care Financing and Policy (DHCFP) staff, MTM staff, transportation providers, and medical facilities of the operations, expectations, and formal policies and procedures that govern each activity associated with the scheduling and delivery of non-emergency transportation (NEMT) services by MTM. All documentation included in this manual is MTM proprietary information and cannot be shared, distributed, etc. without MTM's express consent.

Use and Format

1. DHCFP shall maintain a copy of this *Operating Procedures Manual*, which will be updated by MTM annually and/or as needed.
2. This manual will be used as a basic reference guide for new and existing MTM staff, transportation providers, medical facilities, and DHCFP.
3. Transportation providers will receive a supplemental Transportation Provider Handbook with policies and procedures specific to their operations.
4. Medical facilities will receive a supplemental Facility Packet outlining the rules and regulations of the transportation program that directly apply to facility activities.
5. All staff in MTM's Customer Service Center (CSC) will receive training specific to CSC operations.
6. Although updates may be made at any time, the entire *Operating Procedures Manual* will be reviewed annually. This annual review is the responsibility of MTM's Operations Department.
7. DHCFP may address any questions regarding this *Operating Procedures Manual* with MTM's Program Director.
8. DHCFP will be given the opportunity to review and approve the *Operating Procedures Manual* and any subsequent revisions.
9. Subsequent updates will be distributed to DHCFP staff, transportation providers, and medical facilities when required.
10. All policies included in this manual are generic corporate policies that are used across MTM's book of business. MTM procedures are then created to a corresponding policy if applicable. Procedures can be created to meet specific client needs and can be drafted upon request.

DRAFT

MTM Contact Information

Corporate Office:

Address:	16 Hawk Ridge Dr. Lake St. Louis, Missouri 63367-1829
Phone Number:	636-561-5686
Toll-Free:	888-561-8747
Fax Number:	636-561-2962
Website:	www.mtm-inc.net

Local Office:

Address:	TBD
Phone Number:	XXX-XXX-XXXX
Website:	http://www.mtm-inc.net
Hours of Operation:	7:00 a.m. to 6:00 p.m., Monday through Friday

DHCFP Toll-Free Transportation Number (to schedule transportation): XXX-XXX-XXXX

DHCFP Where's My Ride Toll-Free Number (if ride is late): XXX-XXX-XXXX

Complaint Toll-Free Number (if stakeholder has complaint): 866-436-0457

Transportation Provider Helpdesk (if transportation provider needs assistance): 877-892-3997

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MTM Contractual Responsibilities

MTM is responsible for providing the following contractual services, with services commencing October 1, 2014:

1. **Prior Authorization**: Issue prior authorizations in a timely and accurate manner.
2. **Gate Keeping, Certification and Verification of Need, and Cost-Effectiveness:** Verify member eligibility; assess member need for NEMT services; determine the most appropriate and cost-effective transportation method to meet the member's need and level of care during the transport, including any special transport requirements for the medically fragile or physically/intellectually challenged; and provide education for members on the use of NEMT services.
3. **Reservations, Scheduling, and Trip Assignments:** Receive member requests for transportation and assign the trip to the most appropriate transportation provider. MTM may delegate dispatch activities to the transportation providers, but shall be responsible for the proper performance of dispatching activities.
4. **Quality Improvement:** Provide assurance that transportation providers meet health and safety standards for vehicle maintenance, operation, and inspection; driver qualifications and training; member problem and complaint resolution; and the delivery of courteous, safe, and timely transportation services.
5. **Administrative Oversight and Reporting**: Manage the day-to-day operations necessary for the delivery of NEMT services, the maintenance of appropriate records and systems to report to the member, and response to the terms of the contract.
6. **Broker Records**: Maintain detailed records evidencing administrative costs and expenses incurred pursuant to the contract, the provision of services under the contract, and complaints, for the purpose of audit and evaluation by DHCFP and other federal or state personnel.
7. **Broker/Transportation Provider Records**: Establish, maintain, and provide upon request the records and related information for all transportation providers with which MTM has entered into a service agreement.
8. **Orientation for Transportation Providers**: Provide an orientation program for all transportation providers with which MTM has entered into a service agreement.

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1.0 Member Rights and Responsibilities

Member Rights:

- Transportation for a covered non-emergency medical service allowing the member to arrive at the destination on time.
- The appropriate notification of any denial of a covered service and the right to a Fair Hearing.
- Courteous trip reservations with respect to privacy, confidentiality, and cultural diversity.
- Non-discrimination relating to race, color, national origin, sex, age, or handicap.
- Instructions on how to use NEMT services offered by MTM and/or its subcontracted transportation providers/coordinators.
- Education on the complaint and appeals process.
- Education on how to report verbal or physical abuse, or sexual harassment of any kind.
- Free oral interpretation services for members with limited-English proficiency (LEP).
- Written informational material concerning NEMT services, available in English and other languages as required by DHCFP. Communications must be written at approximately a sixth grade reading level and must be reviewed and approved by DHCFP prior to distribution.
- Information in alternate formats for individuals with special needs (i.e. visually or hearing impaired).
- Safe, reliable transportation services in clean, undamaged, and appropriately equipped vehicles operated by trained, professional, and courteous drivers.

Member Responsibilities:

- When members call to schedule transportation to medical appointments, they must provide their:
    - Medicaid ID number
    - Pick-up address
    - Telephone number
    - Date of birth
    - Date, time, place, and type of appointment(s)
    - Health care provider's name
    - Medical facility name, address, and telephone number to verify appointment(s)
- Members must schedule transportation services for routine medical appointments with five business days' notice.

DRAFT

- Urgent trips, follow-up appointments, and hospital discharges can be set up with less than the required amount of advance notice.
    - If the member calls for urgent/same day trips, MTM is responsible for verifying the urgency of the appointment. MTM may call the medical provider to confirm urgency and will schedule transportation according to DHCFP's protocols and guidelines.
- Members who live within ½ mile of a fixed bus route and whose appointment is within ½ mile of a bus stop are required to ride the bus. A member is excluded from public transit if they meet the DHCFP -approved exclusions. Members will not be required to ride the bus if:
    - They are unable to ride a bus or get to a bus stop due to a physical or mental health condition. MTM will verify with the member's healthcare provider if the member is medically unable to ride a bus.
    - There are inclement weather conditions.
    - The fixed bus route transportation schedule is not compatible with the member's appointment time.
- Members will be assigned to the mode of transportation that is most appropriate to their needs in the following order:
    - Public transportation, including fixed route, Amtrak, and buses
    - Private Auto (Mileage reimbursement)
    - Basic vehicle (ambulatory)
    - Enhanced vehicle (paralift)
- Members may use transportation services for approved services only.
- Members should attempt to use the closest appropriate medical facility unless a healthcare provider has referred the member outside of the immediate community.
- Return trips will only be provided from the point of drop-off where the member obtained authorized healthcare.
- The transportation provider must pick up members within one hour from the time the member calls for the return ride or "will call" trip.

DRAFT

- Members must await pick-up in an area designated as a pre-arranged “look-out” position. This is not necessarily outside but rather an area that allows easy and speedy access to the vehicle. The transportation provider will not be required to wait more than 10 minutes after the scheduled pick up time. The transportation provider’s approved methods for notifying the driver’s arrival include, at minimum, honking, knocking on the door, inquiring at the reception desk, and calling dispatch to place a call to the member.
- Except for services provided by providers in approved bordering counties, all non-emergency out-of-state services require prior authorization from DHCFP.
- MTM is required to provide NEMT services to out-of-state, non-approved counties if prior authorization has been granted by the DHCFP.

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2.0 Health Insurance Portability and Accountability Act (HIPAA) Confidentiality

MTM manages contracts with states, counties, health plans, and other healthcare providers as defined by HIPAA to provide NEMT, central intake and dispatch services, and utilization review reports and services for members. In connection with the provision of such services, MTM receives or obtains Personal Health Information (PHI) regarding the member. As a result, we are a Business Associate of each client with whom we contract.

MTM requires our subcontracted transportation providers and other subcontracted entities to comply with the requirements of HIPAA applicable to Business Associates.

MTM requires our workforce to adhere to the restrictions and conditions regarding PHI. MTM will not disclose PHI to any member of our workforce unless the individual is advised of his/her obligations under HIPAA and the consequences of a violation of these obligations, including disciplinary action should PHI be disclosed in violation of this Section.

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3.0 MTM's Culturally and Linguistically Appropriate Services (CLAS) Standards

To ensure DHCFP and its members receive equitable and effective treatment in a culturally and linguistically appropriate manner, MTM has adopted national CLAS standards issued by the U.S. Department of Health and Human Services Office of Minority Health in 2001. These standards are designed to address the needs of racially, ethnically, and linguistically diverse populations that experience unequal access to healthcare services.

In an effort to provide the most adequate and fair treatment to DHCFP, members, and staff, MTM has adopted three types of standards of varying stringency:

- **CLAS Mandate**: Standards that are current Federal requirements for all members of Federal funds (Standards 4-7). These standards are based on Title VI of the Civil Right Act of 1964.
- **CLAS Guidelines:** Activities recommended for adoption as mandated by Federal, state, and national accrediting agencies (Standards 1–3 and 8–13).
- **CLAS Recommendations:** Services suggested for voluntary adoption (Standard 14).

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4.0 Network Management

Overview of Network Management

MTM's Network Management Department is responsible for recruiting and negotiating contracts with transportation providers; monitoring provider performance to ensure compliance with MTM's Service Agreement; performing on-site observations and vehicle inspections; and completing general transportation provider relations. Network Management staff also ensure that all transportation providers adhere to Federal, state, and local government, laws, rules, and regulations and DHCFP policies.

MTM has developed a network of qualified, licensed transportation providers across the contracted area to ensure comprehensive services. This network includes independent transportation providers, volunteers, taxi cabs and sedans, paralift vehicles, and public transit services.

Network Management Responsibilities

Network Management staff monitor transportation provider performance to ensure the provider complies with MTM's Service Agreement requirements. In doing so, Network Management staff responsibilities include, but not be limited to:

- Recruiting and building a network of transportation providers
- Credentialing the network
- Contracting and training NEMT providers
- Monitoring the transportation network

Recruiting Process

MTM begins recruiting and contracting efforts with existing NEMT providers in the Nevada service area. Using capable transportation providers from an existing network facilitates a smooth transition. If the transportation provider is credentialed under MTM guidelines and knows the history of the program, the geographic area, and the existing members, then the implementation runs very smoothly and satisfaction of the members remains very high. We then turn to other existing local resources for addition to the network. Our staff made one-on-one contact with numerous NEMT providers across the Nevada service area to our RFP submission to introduce ourselves and begin obtaining Letters of Intent. MTM will work with the NEMT provider community to address issues or concerns about rates. We are diligent and creative in all aspects of

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our NEMT provider pool development. We also determine strategies to maximize the use of the area's public transit systems and coordinate with other transportation resources, such as volunteer programs and faith-based organizations.

Credentialing Process

Network Management staff work with each transportation provider to ensure they enter all information properly and that we receive all the required documentation, enabling them to pass MTM's stringent credentialing process. Network Management staff also work with transportation providers to make sure they understand all aspects of the MTM Service Agreement. NEMT providers upload credentialing information into MTM's online provider web portal.

Credentialing information includes, but is not limited to:

- Business contact information
- Any and all licenses required by DHCFP and the state of Nevada
- Standard operating hours and holidays
- List of current drivers, including copies of licenses
- Driver and escort background checks
- Initial hire and random drug screening for drivers and escorts
- Copies of certificates of insurance
- Detailed vehicle information
- Other additional information required by DHCFP

As part of the credentialing process, the Field Inspector visits the NEMT provider's operation. The Field Inspector conducts an on-site inspection of the provider's facilities and vehicles to ensure NEMT providers entering our network have safe and qualified vehicles. The Field Inspector also works closely with the NEMT provider to make certain that s/he understands all contract requirements such as documentation, registration, insurance requirements, driver conduct, and training. The Field Inspector will determine if the provider has the necessary technology, hardware, and software capabilities to provide and maintain accurate and timely records, as required by MTM. The Field Inspector will conduct scheduled and random site visits to verify contract compliance and conduct re-training of contract requirements as needed.

MTM will offer a paper-based process for any providers who might not have or use a computer.

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Contracting and Training NEMT Providers

After we receive all required documentation, MTM's Credentialing Committee, a subcommittee of the Quality Management Committee, conducts a detailed review of the NEMT provider for inclusion into the network. MTM's Executive Vice President and General Counsel chairs the Credentialing Committee. Network Management staff and managers from other operational departments also serve on the committee. Following a review of the NEMT provider's file, the Committee will either approve or deny the provider's inclusion to the network.

MTM provides orientation and ongoing education to transportation providers to ensure high quality, timely service is provided.

Monitoring the Network

As well as continually monitoring the transportation network to maintain sufficient capacity to meet the needs of all members, Network Management staff conducts routine monitoring, including annual monitoring at the transportation provider's base location. MTM also reserves the right to conduct special on-site reviews to address complaints and provide supplemental education. Education is provided via written letters, phone conversations, emails, and faxes from Network Management staff, as well as notifications and information provided on MTM's credentialing website. We employ several monitoring activities to determine if performance thresholds are being met. These activities include:

- Semi-annual scheduled and random on-site visits. In addition to the initial credentialing site visit, the Field Inspector performs regularly scheduled and unscheduled on-site visits to ensure the transportation provider remains compliant with all contract requirements, including MTM's Transportation Provider Service Agreement, and applicable state, Federal, and municipal laws and regulations.

- Initial and semi-annual vehicle inspections. To ensure all vehicles within a provider's fleet meet our safety standards, our local staff will inspect each vehicle prior to the start the contract. Through these inspections, MTM will validate that the vehicle is safe and mechanically

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roadworthy, and determine that it meets or exceeds all DHCFP, MTM, state, Federal, and manufacturer standards. If the vehicle is unsafe or unsatisfactory to the requirements, the vehicle will not be allowed to transport members. MTM will keep records of all vehicle inspections at our local office, where DHCFP will have access as needed.

Upon passing our inspection, each vehicle will be issued an MTM inspection sticker, an example of which is shown above. During their on-street observations, we will check to ensure each vehicle transporting Nevada members appropriately displays this sticker in the rear window. If we discover that a provider is using a non-MTM approved vehicle to transport members, we will immediately take corrective action. Certification stickers on each vehicle will be updated each year following the vehicle's semi-annual inspection to ensure all vehicles remain in compliance with our enforced standards.

- Field monitoring. MTM's locally based Field Inspector conducts on-street observations of drivers to ensure MTM requirements are adhered to, including the maintenance of vehicles, driver adherence to traffic laws, proper mobility device securement, neat appearance, display of proper identification, customer service to the member, use of seatbelts, etc. The Field Inspector conducts the on-street observations, fills out the required MTM form, and presents the outcomes to the transportation provider with corrective actions if necessary. If the Field Inspector witnesses any egregious behavior, they take immediate necessary actions which may include vehicle removal, driver suspension, or termination.

- Performance Report cards. We keep transportation providers informed of their performance level by generating report cards that come to the provider via their MTM transportation provider web portal. These report cards allow transportation providers to benchmark their performance against the average for the Nevada transportation provider network. Data points reported include on-time performance, no-shows, complaints, and trip turn-backs

- Comprehensive complaints processing. If a member or their medical provider wishes to express dissatisfaction with the service they receive from MTM or a transportation provider, he/she may express their concern verbally or in writing. MTM's complaints process encompasses receipt, research, communication, and education to achieve satisfactory resolution.

DRAFT

- Corrective action plans. In the event an inspection or a complaint investigation reveals a deficiency, MTM's Quality Management and Network Management departments coordinate educational calls to the transportation provider. Network Management also places the provider on a Corrective Action Plan (CAP). Network staff will follow up with the provider in 30, 60, and 90 days intervals to make sure the provider achieves compliance with all guidelines. If the non-compliance issue is severe enough, MTM will suspend the driver, the company, or as a last resort, permanently remove the transportation provider from the network.

- Imposing liquidated damages. MTM utilizes liquidated damages to ensure compliance with contract requirements on a routine, predictive basis. MTM clearly educates transportation providers on expectations and gives the opportunity to appeal any adverse decisions.

DRAFT

Network Management Policies Procedures

Policy 101	Transportation Provider Contracting
Policy 102	Transportation Provider On-Site Visits
Policy 103	Transportation Provider Survey
Policy 104	Relaying Transportation Provider Issues
Policy 105	Reporting of Pick-Up and Drop-Off Times
Policy 106	Review of MTM Transportation Provider Contract and Guidelines
Procedure 100.002	Out of Network Transportation Providers
Procedure 100.003	Monthly Transportation Provider Reports
Procedure 100.004	Override Denials
Procedure 100.006	Volunteer Drivers
Procedure 100.009	Contracting Transportation Providers
Procedure 100.011	FWA Training – Transportation Providers
Procedure 100.012	Transportation Provider and Vehicle Inspections - Audits
Procedure 100.013	Driver Credentialing Requirements
Procedure 100.014	Driver Credentialing Application Website Online Review and Credentialing Committee
Procedure 100.016	Credentialing Re-Credentialing Process
Procedure 100.018	Credentialing Sanction Checks
Procedure 100.020	Transportation Provider Rate Documentation
Procedure 101.001	Transportation Provider Contracting
Procedure 101.002	Transportation Provider Meetings
Procedure 100.010	Transportation Provider Insurance Requirements
Procedure 100.013	Driver Credentialing Requirements

DRAFT

Corporate Policy

Subject:	Transportation Provider Contracting	**Policy No.:**	101
Authorized By:	President/CEO	**Date:**	7/30/2001
Department:	Network Management	**Last Revised:**	7/21/2014
Applicability:	Network Management		

PURPOSE:
To ensure that MTM maintains a provider network that is sufficient in the number and types of Transportation Providers needed to meet the non-emergency medical transportation needs of our Clients and to ensure access to transportation services for all eligible members in MTM service areas; by utilizing contracted and Out of Network Transportation Providers. Each Transportation Provider will be required to submit all credentialing information, in accordance with their contractual agreement and according to Client and/or contractual obligations of the contract, to MTM's Credentialing Website. MTM will review and verify all submitted documentation before approving the transportation provider, drivers and vehicles.

POLICY:
Network Management will conduct ongoing provider analysis to ensure network adequacy is met. Transportation Provider recruitment will be conducted on an ongoing basis in MTM service areas to ensure access to adequate and appropriate Transportation Providers. Transportation Providers who meet MTM's standards and who fulfill a recruiting or network adequacy need will be evaluated for credentialing or re-credentialing.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

Out of Network Transportation Provider: Refers to a Transportation Provider that is not currently contracted with MTM to perform transportation services. Out of Network Transportation Providers are not part of MTM's network of Transportation Providers; therefore they are not automatically assigned trips but may be contacted on an individual trip basis when a contracted Transportation Provider is not a viable option for the individual trip.

RESPONSIBILITY:

A. Network Management works closely with the Sales, Marketing and Client Services Departments to obtain membership information, utilization information and any other pertinent information that will allow identification of the need for Transportation Provider Network expansion in existing service areas, as well as areas which are expanding due to Client contracts.

B. Review trip detail reports to identify any unusual increases in trip costs that may be related to the need of additional Transportation Providers.

C. Review Quality Management (QM) complaint reports to identify any areas focused on Transportation Provider Network deficiencies.

D. In existing service areas where there is network inadequacy, the first action will be to utilize transportation providers from adjoining areas to assist in providing necessary transportation.

E. If providers from adjoining areas cannot be utilized an Out-of-Network Transportation Provider may be used on a case by case basis.

F. Transportation Providers interested in joining the MTM Network are directed to our web page to fill out the online application. Once the application (Letter of Intent) is filled out, Network Recruiters will review the application for quality, adequacy and demand. A Network Recruiter will then follow up with each interested applicant within 72 hours from the date the application was received. At this point, the Network Recruiter will give information about MTM and inform the Transportation Provider if we have a demand for transportation in their area. If there is not a need in their area, the Recruiter will explain the Transportation Provider's information will be retained and reviewed as demand rises. If there is a demand, and the Transportation Provider meets MTM qualifications (minimum amount of vehicles, years in business etc.) the Recruiter will begin the contracting process.

G. Once Network Management has received a signed contract back from the Transportation Provider, it is reviewed for accuracy and countersigned by MTM within 48 hours. The Transportation Provider will be required to upload and manage required documents prior to transporting (insurance, background checks, Motor vehicle Records, valid driver licenses, etc.) MTM preforms an internal check on all drivers through State and Federal banned lists through System for Award Management (SAM) and/or Office of Inspector General (OIG). After all required documents have been approved the Transportation Provider will be

presented to the Credentialing Committee for approval. All required credentialing documents will be verified and countersigned by MTM, before the transportation provider, drivers and vehicles are submitted to MTM's Credentialing Committee.

H. Once approved by MTM's Credentialing Committee, the contracts are sent to MTM's Network Management leadership for filing. In the event that a driver is denied by MTM's Credentialing Committee, the Transportation Provider will receive notification via MTM's credentialing website and an email; the Transportation has 30 days to appeal MTM's decision.

I. All aspects of Transportation Provider services to MTM are monitored for compliance with the MTM Services Agreement, and if applicable, the MTM Transportation Provider Guidelines.

J. MTM must follow contractual requirements within the MTM Services Agreement regarding termination for cause or termination without cause.

K. MTM's General Counsel will draft a letter of termination and the letter will be sent to the Transportation Provider via Certified Mail.

L. Transportation providers have the right to appeal MTM's decision to terminate their contract. This appeal must be received in writing within 90 days of the termination notice. The appeal will be sent to MTM's General Counsel for the final decision.

M. Credentialed and contracted providers are reported to the Quality Management Committee (QMC) on a quarterly basis by month for tracking, trending, and quality improvement.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Network Management	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Transportation Provider On-Site Visits	**Policy No.:**	102
Authorized By:	President/CEO	**Date:**	10/28/2002
Department:	Network Management	**Last Revised:**	5/1/2014
Applicability:	Network Management		

PURPOSE:
To ensure compliance with MTM's Transportation Provider Guidelines. Areas of non-compliance will be addressed through appropriate education by MTM staff and may result in disciplinary measures. Site visits may include an On-Site Visit of the Transportation Provider's facility, Vehicle Inspections, and On-Street Observations.

POLICY:
Site Visits will be conducted to review and discuss the requirements of the Transportation Provider Guidelines and complete Vehicle Inspections of the Transportation Provider's fleet of vehicles. MTM will conduct On-Site Visits and Vehicle Inspections for contracted Transportation Providers. In addition to the initial site visits, MTM may conduct Special On-Site Visits and Vehicle Inspections or complete On-Street Observations in response to an identified compliance or quality issue.

RESPONSIBILITY:
On-Site Visits:

A. The Field Inspector or MTM delegate will inform the Transportation Provider they must have all aspects of the contracting and credentialing process in place for review during the visit. MTM will review and verify all documentation before approving the transportation provider, drivers and vehicles.
B. During the On-Site Visit the Field Inspector or MTM delegate will complete the site visit to ensure compliance with the MTM Transportation Provider Guidelines. The Field Inspector or MTM delegate will discuss deficient areas with the Transportation Provider at the time of the visit.

C. If compliance is not met, the Transportation Provider may be removed from the MTM network, assessed Liquidated Damages or issued written notification of non-compliant items through a Performance Improvement Plan (PIP).
D. Field Inspector or MTM delegate will offer assistance to the Transportation Provider in responding to actions identified in the PIP.
E. If compliance to the PIP is not met the Field inspector or MTM delegate may pursue disciplinary measures, including suspension or termination from the MTM network or assess Liquidated Damages.
F. Completion of site visits is reported to the Quality Management Committee (QMC) on a monthly basis for tracking, trending, and quality improvement.

Vehicle Inspections:

A. The Field Inspector or MTM delegate will award each vehicle as “Pass” or “Fail” based upon the vehicle inspection.
B. In lieu of a failed vehicle inspection the Field Inspector or MTM delegate will allow Transportation Provider time to fix or repair the failed section. The vehicle must be re-inspected or proof of repair provided prior to the vehicle being approved or re-approved.
C. The Field Inspector or MTM delegate will affix a MTM inspection sticker on the window of each vehicle that has been awarded a “Pass” during the inspection process.
D. In lieu of a MTM vehicle inspection, a vehicle inspection from the State or Federal Department of Transportation (DOT) or a governmental regulating authority may be substituted in place of the MTM vehicle inspection.
E. Network Management will maintain Vehicle Inspection Forms in the Transportation Provider Credentialing Website.

On-Street Observations:

A. The Field Inspector or MTM delegate may conduct Transportation Provider monitoring to observe Transportation Providers, drivers and vehicles during the normal course of work.
B. The Field Inspector or MTM delegate may choose Transportation Providers for random compliance review or in response to identified compliance or quality issues.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Provider Network	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Transportation Provider Survey	**Policy No.:**	103
Authorized By:	President/CEO	**Date:**	7/2/2001
Department:	Network Management	**Last Revised:**	5/1/2014
Applicability:	Network Management		

PURPOSE:
To gather feedback and information from all Transportation Providers on their level of satisfaction with MTM.

POLICY:
Transportation Provider Surveys are conducted annually.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:

A. A Transportation Provider Survey is issued annually to all Transportation Providers in the MTM Network by a third-party survey company.
B. Transportation Providers will return the surveys to the surveying company by the designated deadline.
C. Once the surveying company has received all surveys, they will collect the data and report it to MTM.
D. This data is reported to the Quality Management Committee on an annual basis for tracking, trending, and quality improvement.
E. Survey findings are reported to MTM's Clients upon request.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Provider Network	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Relaying Transportation Provider Issues	**Policy No.:**	104
Authorized By:	President/CEO	**Date:**	4/8/2005
Department:	Network Management	**Last Revised:**	5/1/2014
Applicability:	Network Management		

PURPOSE:
To ensure that any Transportation Provider issues (such as dispatch problems, computer issues, or vehicle troubles, etc.) are communicated to appropriate departments in a timely manner.

POLICY:
A notification will be sent immediately if the Network Management Department receives notification from a Transportation Provider that they are experiencing difficulties in the execution of contracted services for MTM.

RESPONSIBILITY:

A. When a Transportation Provider calls to report difficulties in the execution of duties contracted by MTM, the Network Management staff will obtain specific details.
B. Network Management will troubleshoot when the obstacle will be overcome, where the problem is affecting the Transportation Provider's service and the scheduled trips which are affected.
C. Network Management will notify any Departments affected by these difficulties.
D. The Network Management Department will take appropriate steps to ensure that MTM services will not be interrupted.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Provider Network	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Reporting of Pick-Up and Drop-Off Times	**Policy No.:**	105
Authorized By:	President/CEO	**Date:**	7/11/2001
Department:	Network Management	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
To help ensure Transportation Providers remain compliant in reporting of Pick-up and Drop-off (PUDO) times.

POLICY:
Transportation Providers' submission of PUDO times are recorded and tracked in order to maintain compliance, to track and trend the timeliness of each Transportation Provider.

RESPONSIBILITY:

A. In accordance with contractual obligations, each month Network Management receives the "PUDO Report." This report is reviewed by the Network Management delegate, who reviews each provider in his/her territory for compliance in submission.
    - If a Transportation Provider is identified as non-compliant, Network Management will contact the Transportation Provider to review:
        - Proper submission of electronic PUDO
        - Troubleshooting with the FTP site.
B. Transportation Providers may be assessed liquidated damages or non-payment of trips when they are deficient in reporting PUDO times.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Provider Network	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Review of MTM Transportation Provider Contract and Guidelines	**Policy No.:**	106
Authorized By:	President/CEO	**Date:**	8/16/2001
Department:	Network Management	**Last Revised:**	5/1/2014
Applicability:	Network Management		

PURPOSE:
To provide a process and timeframe for review and updating of the MTM Transportation Provider Contract, and to provide Transportation Providers with documentation and a clear understanding of the quality requirements and expectations of members of the MTM Transportation Provider Network.

POLICY:
The MTM Transportation Provider Contract is reviewed and updated as necessary. Revised Contracts must be signed by the Transportation Providers.

RESPONSIBILITY:

A. All MTM departments may submit suggestions for revisions and additions to the Transportation Provider Contract.
B. The Committee responsible for the review and revision of the Contract includes: MTM's Executive VP & General Counsel, Vice President of Operations, Manager, Network Operations and the Contract Officer.
C. Once the revision is completed and issued to the Transportation Provider, the company must return the Contract to MTM by the date requested
D. A copy of the revised Contract is loaded to the Transportation Provider website once MTM has countersigned for provider records.
E. Failure to return by the date requested may result in disciplinary action or termination from the network.

NOTE: MTM will not approve/renew a transportation provider, their drivers and vehicles until all required documentation has been submitted and verified by MTM

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Provider Network	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Procedure

Subject:	Out Of Network Transportation Providers	**Procedure No.:**	100.002
Authorized By:	Director, Provider Network	**Date:**	1/20/2012
Department:	Network Management	**Last Revised:**	5/1/2014
Applicability:	Network Management		

PURPOSE:
To ensure that MTM is capable of accommodating short-notice trips, urgent appointments, 24 hour access to and from covered services, and be prepared to respond to Transportation Provider no-shows or issues. Out of Network Transportation Providers will be used after all contracted Transportation Providers have been exhausted as a viable option to provide the required transportation services.

POLICY:
Policy 100 – Transportation Provider Contracting

RESPONSIBILITY:
The following will be conducted by Network Management when utilizing an Out of Network Transportation Provider:

Review city or county ordinances regulating Taxi-Cab or For-Hire Transportation Providers to ensure the company is licensed and drivers and vehicles are reviewed and approved by the regulating authority.

The following minimum requirements will be confirmed by Network Management:

- Insurance: verify the Out of Network Transportation Providers have adequate insurance to meet the requirement of the regulating authority
- Vehicle: verify that each vehicle is reviewed and approved for general public use by the regulating authority
- Drivers: verify that each driver must submit a Motor Vehicle Record and Criminal Background Check to the regulating authority for review and approval prior to providing transportation to the general public

NOTE: MTM will verify all documentation submitted prior to approving transportation providers, drivers and vehicles

This procedure is reviewed by the appropriate department management on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Provider Network Date

Corporate Procedure

Subject:	Transportation Provider Reports	**Procedure No.:**	100.003
Authorized By:	Director, Provider Network	**Date:**	1/27/2012
Department:	Network Management	**Last Revised:**	5/1/2014
Applicability:	Network Management		

PURPOSE:
Each month as required by the Client, Network Management generates a report from MTM's Credentialing Website for the Client and Transportation Providers servicing their network

POLICY:
Policy 100 – Transportation Provider Contracting

RESPONSIBILITY:
Network Management generates the following reports for each Client identified by Client Services.

A. The first report is a list of all credentialed Transportation Providers servicing the Client's members.
B. The second report is a list of all credentialed drivers for the Transportation Providers.
C. The last report is a list of the Transportation Provider's approved vehicles.

Once the reports have been generated, they are reviewed for accuracy and delivered to the appropriate Program Manager/Director.

This procedure is reviewed by the appropriate department management on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____
Director, Provider Network Date

Corporate Procedure

Subject:	Override Denials	**Procedure No:**	100.004
Authorized By:	Director, Provider Network	**Date:**	1/30/2012
Department:	Network Management	**Last Revised:**	5/1/2014
Applicability:	Network Management		

PURPOSE:
The purpose is to formalize an override of a trip which has previously been denied through the MTM appeals process.

POLICY:
Not Applicable

RESPONSIBILITY:

A. A Transportation Provider would initiate the override by contacting their Network Representative. The Transportation Provider would identify to the Network Representative the trip number, include the reason the trip was initially denied, and any documentation which would reverse the denial.
B. The Network Representative would gather all supporting documentation. Once the Network Representative is satisfied that the documentation gathered is adequate, the Network Representative would present all documentation, including the "Override Denial Form" to the Supervisor of Trip Reconciliation.
C. The Supervisor of Trip Reconciliation will review documentation and will either deny the trip or approve of the override. To demonstrate the approval, the Supervisor of Trip Reconciliation will sign the "Override Denial Form" and deliver to either the Chief Executive Officer (CEO) or the Vice President of Operations.
D. The CEO or VP of Operations will then review the form and either deny the trip or approve by signing the form.
E. The form will then be delivered back to the Supervisor of Trip Reconciliation to process and initiate payment for the Transportation Provider.

This procedure is reviewed by the appropriate department management on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Provider Network Date

Corporate Procedure

Subject:	Volunteer Drivers	**Procedure No.:**	100.006
Authorized By:	Director, Provider Network	**Date:**	7/1/2012
Department:	Network Management	**Last Revised:**	5/1/2014
Applicability:	Network Management		

PURPOSE:
To ensure that MTM maintains a volunteer network as applicable by plan that meets the non-emergency medical transportation needs of our clients. To verify each volunteer submits all required documentation to MTM's Credentialing Website. All information will be reviewed for accuracy and verified prior to being approved for participation in the MTM Network. Corp. of Independent Contractors will also validate and assess the qualifications of the volunteer drivers prior to the provision of transportation services. The decision to include a volunteer driver in the MTM Transportation Provider Network is based on a review and evaluation of the volunteer driver's credentials. Corp. of Independent Contractors will also add volunteer drivers into the MTM NET System, phone directory and will notify the correct departments of the volunteers status updates. Corp. of Independent Contractors monitors each volunteer so they are not being utilized for MTM business when there are non-compliance issues.

POLICY:
Policy 100 Transportation Provider Contracting

RESPONSIBILITY:
A volunteer driver is one who may provide transportation and is not contractually bound to provide services. Volunteers are those drivers using their own vehicles or that of a not for profit entity to transport members to and from covered services and whom are reimbursed for their mileage only and not other services.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Provider Network Date

Corporate Procedure

Subject:	Credentialing: Contracting with Transportation Providers	**Procedure No:**	100.009
Authorized By:	Director, Provider Network	**Date:**	9/3/2013
Department:	Network Management	**Last Revised:**	5/1/2014
Applicability:	Network Management		

PURPOSE:
To ensure each transportation provider is provided with a detailed and comprehensive list of expectations and requirements; those documents include but are not limited to the following:

- Transportation Services Agreement (Contract)
- Appendix A (Handbook)
- Appendix B (Credentialing Guidelines)
- Appendix C (Medicare Advantage/Medicaid Program Addendum)
- Schedule A (rates)
- Schedule B (Liquidated Damages)

Transportation Services Agreement (Contract) and Appendix A (Handbook) which contains, but is not limited to, a list of expectations and requirements outlining the scope of work, driver requirements, vehicle requirements, training and personnel policies, compensation, liquidated damages, insurance, education and training.

Appendix B contains a list of required credentials in order for the transportation provider and its drivers to become approved to contract with MTM. MTM will verify all required credentialing documents before approving transportation providers, drivers and vehicles. Providers will be notified via email any time MTM approves a company, driver, or vehicle.

Appendix C contains a list of requirements for the Medicare Advantage/Medicaid Program Addendum. The requirements include, but are not limited to, compliance, privacy, confidentiality, audits, records, payments, accountability, delegated activities, policies and procedures.

The Centers for Medicare and Medicaid Services ("CMS") and associated laws, rules and regulations regarding the Medicare Advantage ("MA") and Medicaid Program require that managed care organizations provide compliance of contracted network providers, their respective employees and contracted individuals and entities within certain MA and Medicaid Program requirements.

Scheduled A (rates) – the Schedule A contains mutually agreed upon rates MTM pays to the transportation provider and/or drivers for their services.

Scheduled B (Liquidated Damages) – contains a list of financial damages the transportation provider and/or drivers will be assessed in the event they do not meet certain contractual requirements.

POLICY:
Policy 100 – Provider Contracting

RESPONSIBILITY
Each transportation provider is provided with a Transportation Services Agreement (contract) and Appendix A (Handbook), Appendix B, Appendix C, Scheduled A and Scheduled B which explains all MTM expectations and requirements.

A. The Transportation Provider must agree to, sign and return the Transportation Services Agreement and Appendix A (receipt page only), Appendix B (receipt page only), Appendix C (receipt page only), Schedule A and Schedule B back to MTM for counter-signing.
B. MTM will then review the documents, countersign (where applicable), and upload a copy of each document into the MTM Credentialing application website for the transportation provider's records. All documents will be verified by MTM prior to approving transportation providers, drivers and vehicles. MTM will notify providers if any of the documents do not meet our compliance standards.
C. All documents related to contracting and credentialing of transportation providers is stored electronically within the MTM Credentialing application website.
D. MTM retains the right to amend any/all of the contractual documents upon written notice to the transportation provider in order to maintain consistency and/or compliance with any state or federal law, policy, directive, or government sponsored program requirements.
E. If the transportation provider does not deliver to MTM written notice of rejection of the amendment within ten (10) days of the date of the notice of the amendment, the amendment shall be deemed accepted and shall be binding upon the transportation provider.

F. The parties agree that if any terms of the contractual documents are in conflict with any state or federal laws or regulations, such conflicted terms of these documents shall be deemed waived and unenforceable.

This procedure is reviewed by the appropriate department director on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Provider Network Date

Corporate Procedure

Subject:	Credentialing : Fraud, Waste and Abuse Training	**Procedure No:**	100.011
Authorized By:	Director, Provider Network	**Date:**	9/5/2013
Department:	Network Management	**Last Revised:**	5/1/2014
Applicability:	Network Management		

PURPOSE:
To educate and train the Transportation Provider on the importance of preventing and reporting suspected Fraud, Waste and Abuse (FWA) to MTM while providing transportation services.

POLICY:
Policy 100 – Provider Contracting

RESPONSIBILITY

1. Training materials will be provided to the transportation provider through MTM's corporate website at www.mtm-inc.net/transportation-management/training.
2. The Attestation form confirming all employees have been trained must be signed/dated by an authorized company representative and submitted onto the Credentialing application website.
3. Provider Network staff will review the Attestation, approval will be submitted once the Attestation is filled out appropriately (signature/date); notification will be sent to the transportation provider via the Credentialing application website.
4. The Attestation form must be updated annually, verifying training has been completed for all employees.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Provider Network Date

Fraud, Waste, and Abuse Attestation

As part of your ongoing training and education, you are required to review the Fraud, Waste and Abuse training presentation on an annual basis. By signing this document, you acknowledge that you and your staff involved with MTM assigned trips have reviewed and understand the Fraud, Waste and Abuse training presentation. Any questions you may have regarding the Fraud, Waste and Abuse training presentation should be directed through your chain of command.

Company Name: (please print) _____

Employee Name: (please print) _____

Employee Title: (please print) _____

Corporate Procedure

Subject:	Credentialing: Provider Audit and Vehicle Inspection	**Procedure No:**	100.012
Authorized By:	Director, Provider Network	**Date:**	9/6/2013
Department:	Network Management	**Last Revised:**	5/1/2014
Applicability:	Network Management		

PURPOSE:

To ensure each transportation provider is fully audited by the Provider Network staff annually to confirm full compliance with all of MTM's contractual requirements and other obligations.

POLICY:

Policy 100 – Provider Contracting

RESPONSIBILITY

A. Transportation provider audit (via on-site or desk-top) and vehicle inspections forms are completed annually to conduct a full review of all credentialing items submitted by the transportation provider.
B. When a Transportation Provider Audit (on-site) is preformed, the Provider Network staff will set up a meeting at the provider's facility to review the credentialing items. Both parties (MTM and the transportation provider) review and agree to the results/terms/conditions of the audit form and both parties are required to sign/date the form.
C. Provider Network staff will perform a vehicle Inspection on every vehicle providing (or will be providing) service for MTM. Transportation providers are required to provide a copy of a valid vehicle license registration for each vehicle they intend to utilize while providing services to MTM.
D. Once considered satisfactory/approved (based on contractual requirements) by the Provider Network staff, the vehicle Inspection will be retained within the Credentialing application website. Both the vehicle Inspection and vehicle registration must be in an approved status prior to vehicle being utilized and/or approved.
E. Transportation providers are required to submit renewed documentation for all renewable items prior to their individual expiration dates on the Credentialing application website.

F. Transportation providers cannot use a vehicle which has not been approved or has reached the expiration date on its registration and/or approval by MTM.
G. When a Transportation Provider Audit is performed by a (desk top audit), Provider Network staff will review the credentialing items (Appendix B) on the Credentialing application website. If fully compliant, the Provider Network staff will sign/date the form.
H. If there are discrepancies, the transportation provider will receive the audit form to review and correct. Once all discrepancies have been corrected, the transportation provider will notify the Provider Network staff and an additional desktop audit or an on-site audit will be performed for final review to ensure the corrections have been made.
I. A final copy of the audit form (once fully approved) is placed on the Credentialing application website.
J. The process repeats annually unless a serious concern would require the Provider Network staff to perform an ad-hoc audit immediately to satisfy the concern of the health plan.

NOTE: MTM will verify all documentation before approving transportation providers, drivers and vehicles

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Provider Network Date

Corporate Procedure

Subject:	Credentialing : Driver Credentialing Requirements	**Procedure No:**	100.013
Authorized By:	Director, Provider Network	**Date:**	9/6/2013
Department:	Network Management	**Last Revised:**	5/1/2014
Applicability:	Network Management		

PURPOSE:

To maintain compliance by having the transportation provider submit documentation required for approval of drivers prior to providing transportation services. The documents are submitted and monitored through the Credentialing application website, and renewed based on the expiration dates or state requirements.

POLICY:

Policy 100 – Provider Contracting

RESPONSIBILITY

A. Transportation providers must submit a background check on the Credentialing application website for every driver that will be used to service MTM members.
    - Transportation provider must not use any driver or attendant with any of the following convictions or substantiated incidents:
        - Child abuse or neglect
        - Spousal abuse
        - Crimes against children
        - Crimes against the elderly or infirm
        - Crimes involving rape, sexual assault, or other sexual offenses – this check must be done via the National Sex offender Public Website www.nsopr.gov and done independently from background check, and must be submitted to MTM yearly for credentialing and re-credentialing purposes
        - Homicide

- Transportation provider must not use any driver or attendant who has the following return notification from any background screening:
    - "Category" is shown as physical abuse or sexual maltreatment
    - "Severity" is shown as moderate, serious/severe, permanent damage, or fatal abuse or maltreatment
    - "Conclusion" is listed as court adjudicated or probable cause.
- Transportation provider must not use any person as a driver or attendant in the conduct of MTM services who has a felony criminal conviction of a felony offense within the immediate past five (5) years. Further, any conviction, plea of guilty, finding of guilty, or plea of "nolo contendere" (misdemeanor or felony) for any of the following driving offenses within the previous five (5) years shall disqualify a driver from performing MTM services:
    - DUI or DWI, or other alcohol related offense
    - Reckless driving

B. Transportation providers must submit a certificate for Defensive Driving Training (Certificate provided by the certified trainer) on the Credentialing application website. This must be renewed every 3 years.

C. Transportation provider must submit a copy of the Driver's License(s) for each driver on the Credentialing application website. (Must have valid driver's license).

D. Transportation providers must submit Driving Records (must be less than one year old) on the Credentialing application website.
- Transportation provider must not use any driver with the following:
    - Convicted of more than two (2) minor motor vehicle moving violations within the previous twenty-four (24) months
    - More than one (1) at-fault incident (accident) resulting in personal injury or property damage within the previous thirty-six (36) months, or three (3) or more cumulative vehicle accidents within the previous five (5) years
    - A combination of one (1) unrelated minor motor vehicle moving violation and one (1) at-fault incident (accident) resulting in personal injury or property damage within the previous twenty-four (24) months
    - Revocation or suspension of the driver's vehicle operator's license within the previous three (3) years for accumulation of points or alcohol related incident

E. MTM will perform the OIG (Office of Inspector General) check monthly for each transportation company and driver. MTM will track results and deactivate any transportation provider or driver who has prohibitive sanctions against them.
- Performed monthly by ComplianceLine (SanctionCheck.com). Monthly checks will also be done for the States of Texas and Ohio via SanctionCheck.com

F. The transportation provider must submit a copy of their First Aid Training certificate or card. This must be renewed by expiration date.
    - Must have valid card/certificate.
G. MTM will perform the System for Award Management (SAM) check for each driver. MTM will monitor and track results and deactivate any transportation provider and/or driver who has prohibitive sanctions against them.
    - Performed monthly by ComplianceLine (SanctionCheck.com)
H. The transportation provider must submit a certificate of training for Assisting Passengers with Disabilities on Credentialing application website.
    - Must be renewed every 3 years.
I. The transportation provider must submit a certificate of training for Emergency Situations on the Credentialing application website.
    - Must be renewed every 3 years.
J. The transportation provider must submit a certificate of training for Wheelchair Securement on the Credentialing application website.
    - Must be renewed every 3 years.
K. Transportation provider must submit a Pre-Employment Drug Screen for each driver on the Credentialing application website.
    - Transportation provider must assure current laws regarding drug and alcohol testing are enforced for any of their drivers or attendants.
    - If MTM or the transportation provider has reasonable suspicion of a driver or attendant to be under the influence of alcohol or drugs, the transportation provider must immediately remove the driver or attendant from MTM service and submit the driver or attendant to an alcohol and/or drug screening at the transportation provider's expense.
    - Refusal to submit to testing within the designated time frame is considered a positive test result and will have the same disciplinary consequences.
    - Drivers or attendants testing positive for drugs and/or alcohol will no longer be permitted to transport MTM members or provide any other service to MTM members.
L. Transportation provider must meet all of the requirements listed above prior to taking trips for MTM. The Credentialing application website will generate electronic notifications to inform the transportation provider of the approval or rejection of credentials and drivers.

NOTE: MTM will verify all credentialing documentation before approving/rejecting a driver for service

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Provider Network Date

Corporate Procedure

Subject:	Credentialing: Credentialing Application Website, Online Review Process & Credentialing Committee	**Procedure No:**	100.014
Authorized By:	Director, Provider Network	**Date:**	9/6/2013
Department:	MTM Corporate	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:

The purpose of the procedure is to outline the online review process for the Credentialing application website, specifically for United Health Care. The Credentialing application website is an online tool created to help transportation providers and MTM manage credentialing information electronically. Using the website (https://onlineaccess.mtm-inc.net/index/login), all credentialing interaction between transportation providers and MTM is online and via e-mail. MTM monitors compliance for all transportation providers through the Credentialing application website.

POLICY:

Policy 100 – Transportation Provider Contracting

RESPONSIBILITY:

A. Transportation providers are required to submit all credentials using the Credentialing application website.
B. The Provider Network staff will be notified of the need to review and verify the credential; as soon as the credential has completed the review and verification process, the results are available to the provider online.
C. If a credential is not approved, the Provider Network staff details the reason the credential was not approved to assist the transportation provider in completing the approval process.
D. If all credentials are complete, accurate and have been verified by MTM, the driver and/or vehicle is approved for use.
E. A list of “To Do’s” is generated by the Credentialing application website for the Provider Network staff and they will work in chronological order based from the due date of the individual credential in question (due date is set for one week prior to the expiration date of the credential).

F. The Provider Network staff must review and verifiy credentials submitted by the transportation providers to determine if they meet all contractual obligations/expectations.
G. When a transportation provider submits a credential, they must provide all supporting documentation and enter required data for the specific credential. The first step to approving a credential is to verify that both the data and the document submitted by the transportation provider meet all contractual obligations/expectations.
H. If the document is not valid or does not meet all contractual obligations/expectations, the Provider Network staff rejects the credential.
I. When rejecting a credential, the Provider Network staff will allow the transportation provider to upload a new document after they have contacted the transportation provider to inform them that their credential was not approved.
J. When the credential is verified and approved, the date displayed will be considered the approval date. Once all credentials appear to be satisfied, met the status of the transportation provider and /or driver changes to “Pending Approval” or “Pending Re-Approval.”
K. A system generated report is reviewed by the Credentialing Committee on a weekly basis for any items that are “Pending Approval” or “Pending Re-Approval.”
L. Any item falling into the “pending” category must be renewed and approved to be removed from the “pending” category.
M. Provider Network staff will review and verify the transportation provider’s credentialing file for all necessary and required documents prior to submitting the file to the Credentialing Committee for their vote to approve or reject the transportation provider and/or an individual driver based on contractual requirements.
N. Once approval is granted from the Credentialing Committee, the information is marked as approved within the Credentialing website application so the transportation provider knows real-time status of each driver and or company credential in question.
O. When an item is not approved by the Credentialing Committee, the item is marked as rejected and an automatic message (e-mail) is sent to the transportation provider regarding the rejection.
P. The transportation provider is fully credentialed and approved once all contractual related items are verified, approved and counter-signature pages have been provided to MTM. The status is updated and displays the changes on the Credentialing website application in real-time, therefore the transportation provider is current on MTM’s processing of their information.

Q. Transportation providers will receive up to four periodic notifications from the Credentialing application website prior to the expiration date of each credential. If the transportation provider does not act upon these notifications, the original credential remains valid until the expiration date.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

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Director, Provider Network Date

Corporate Procedure

Subject:	Credentialing: Re-Credentialing Process	**Procedure No:**	100.016
Authorized By:	Director, Provider Network	**Date:**	9/6/2013
Department:	Network Management	**Last Revised:**	5/1/2014
Applicability:	Network Management		

PURPOSE:
To ensure continued compliance by re-credentialing each transportation provider, vehicle and driver that provides transportation services for MTM. During the re-credentialing process, all required documents are reviewed for accuracy, quality and compliance purposes. All required documents will be verified by MTM; and drivers and vehicles that are not re-credentialed cannot be used to provide transportation services for MTM until re-credentialing documentation is in place and has been approved by Provider Network staff.

POLICY:
Policy 100 – Provider Contracting

RESPONSIBILITY:

A. Transportation providers will receive up to four periodic notifications from the Credentialing application website prior to the expiration date of each credential that has been previously approved within the Credentialing application website. Notifications come from NoReplyNEMT@mtm-inc.net and if a transportation provider has any questions or other issues they can contact the helpdesk at tphelpdesk@mtm-inc.net.
B. MTM will receive a notification from the Credentialing application website to review and verify the new or updated credentials that were submitted by the transportation provider.
C. The Transportation provider must submit the new documentation before the expiration date of the original credential (Referenced in Appendix B).
D. If the new documentation submitted is not valid or does not meet MTM's standards, the original credential date will remain valid until the expiration date of that credential.

E. Provider Network staff will add a comment back to the transportation provider within the Credentialing application website explaining the reason for the rejection. The transportation provider's newly submitted documentation will not be approved until it has been verified and fully meets MTM's requirements.
F. Provider Network staff will review and verify each document pertaining to the company, driver or vehicle before they are submitted for review by the Credentialing Committee.
G. Once all aspects are reviewed, verified and approved by the Credentialing Committee, the company, drivers and vehicles are activated within the Credentialing application website and they are eligible to begin providing services for MTM.
H. Provider Network staff continually updates the Credentialing application website so the transportation providers have the most current information related to their own information.
I. The above process is repeated each time any piece of credentialing (Referenced in Appendix B) information is scheduled for renewal.

NOTE: MTM will verify all credentialing documentation before re-credentialing transportation providers, drivers and vehicles

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

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Director, Provider Network Date

Corporate Procedure

Subject:	Credentialing: Sanction Checks	Procedure No:	100.018
Authorized By:	Director, Provider Network	Date:	2/20/2014
Department:	Network Management	Last Revised:	5/1/2014
Applicability:	Network Management		

PURPOSE:
To maintain oversight and ensure compliance of transportation providers, their employees, drivers (whether employees or independent contractors) and attendants/aides, etc. by screening a third-party data base for potential prohibitive sanctions listed by, but may not be limited to the following entities:

- System for Award Management (SAM)
- Office of Inspector General (OIG)
- U.S. Treasury and Blocked Persons & Office of Foreign Assets Control (OFAC)
- Office of Personnel Management (OPM)

Per the Centers for Medicare & Medicaid Services (CMS) Managed Care Manual Chapter 21, sanction checks are required every 30 days (or more often if required by MTM) for approval of transportation providers and personnel prior to providing transportation services. The transportation provider and personnel are monitored through the Sanction Check Website (www.sanctioncheck.com)

POLICY:
Policy 100 – Provider Contracting

RESPONSIBILITY

A. Sanction checks will be performed for each transportation company/personnel.
B. Information maintained for each driver/attendant/aide will include, but may not be limited to first name, last name, date of birth, driver's license number, and vendor code.
C. Information maintained for each company will include, but may not be limited to the transportation company name, vendor code, state, and federal tax ID number.

D. All information maintained will be saved to MTM's credentialing files by month and year.
E. After a full review has been completed and if the company or any personnel are found to be a match, MTM will follow the contractual agreements regarding next steps.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Provider Network Date

Corporate Procedure

Subject:	Transportation Provider Rates	**Procedure No:**	100.020
Authorized By:	Director, Provider Network	**Date:**	5/1/2014
Department:	Network Management	**Last Revised:**	
Applicability:	Network Management		

PURPOSE:
To monitor the rate agreement between MTM and the transportation providers as listed on their Schedule A.

POLICY:
Policy 100 – Provider Rates

RESPONSIBILITY

A. MTM will negotiate rates with each transportation provider at the beginning of their contract. Once both parties are in agreement, the transportation provider signs the Schedule A, an attachment to the Services Agreement (contract).
B. MTM then countersigns the documents and uploads them to the provider website application.
C. The agreed upon rates are programmed into the NET Management System.
D. Each time rates are renegotiated and changed, the same basic steps apply as listed above, with the exception of a new contract; an amendment to rates is satisfactory.
E. New effective dates are documented, new rates are entered into the NET Management System and the new effective date is when the new/revised rates go into effect.
F. The rates are tracked and monitored through not only the NET Management System but also by manual means within the Provider Network department.
G. The rates will be negotiated at MTM's discretion or as needed.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Provider Network Date

Corporate Procedure

Subject:	Transportation Provider Contracting	**Procedure No.:**	101.001
Authorized By:	Director, Provider Network	**Date:**	1/30/2012
Department:	Network Management	**Last Revised:**	7/21/2014
Applicability:	Network Management		

PURPOSE:
To ensure that MTM maintains a provider network that is sufficient in the number and types of providers needed to meet the non-emergency medical transportation needs of our clients. To verify each Transportation Provider submits all required documentation to MTM's Credentialing Website. All information will be reviewed for accuracy and verified prior to being approved for participation in the MTM Network. Network Management will also validate and assess the qualifications of the Transportation Provider's drivers prior to the provision of transportation services. The decision to include a Transportation Provider and individual drivers in the MTM Transportation Provider Network is based on a review and evaluation of the Transportation Provider and driver's credentials. Network Management will also add Transportation Providers into the MTM NET System, phone directory and will notify the correct departments of the Transportation Providers status updates. Network Management monitors each Transportation Provider so they are not being utilized for MTM business when there are non-compliance issues.

NOTE: MTM will verify all documentation before approving transportation providers, drivers and vehicles

POLICY:
Policy 101 – Transportation Provider Contracting

RESPONSIBILITY:
Recruiting/Credentialing/Contracting:

A. In existing areas where there is network inadequacy, the first action will be to utilize Transportation Providers from adjoining areas to assist in providing necessary transportation.

B. If providers from adjoining areas cannot be utilized, an Out-of-Network Transportation Provider may be used on a case by case basis.
C. Transportation Providers must meet MTM standards and satisfy a recruiting or network adequacy need in order to be approved for network participation.
D. All drivers in network will go through MTM's current credentialing process and must be approved by the Credentialing Committee prior to providing services for MTM (unless the Transportation Provider is considered an Out of Network Transportation Provider).
E. Once Network Management receives a Transportation Provider's questionnaire, Network Management verifies all provider profile information (i.e., vehicle types, hours of operations, special services, fees and billing information). The Contracting/Credentialing process begins with entering the Transportation Provider into MTM's NET System and submitting a request for the Transportation Provider to be added to MTM's Credentialing Website through Issuetrak.
F. The Recruiter gives the Transportation Provider their username and password and requests training for the Transportation Provider from the Trainer. The Transportation Provider may begin submitting credentials for Network Management verification and approval.
G. All Owners/Officers/Drivers will be checked against State and Federal banned lists.
H. Once all credentials have been submitted, verified and approved by MTM, and sent to the provider for signature, contracts are created with an effective date of the 1st or 15th of the month or the start date of the new plan.
I. Once Network Management has received the signed contract from the Transportation Provider, it is reviewed for accuracy and countersigned by MTM within 48 hours of receipt.
J. The contracts along with all other required credentialing information are then presented to MTM's Credentialing Committee in an organized format. All documents must be presented in the exact same order in the completed file.
K. The members of the Credentialing Committee will review the presented file and state whether he/she approves or disapproves the Transportation Provider and/or driver for participation in the network. Objections must be documented and reasons for objections stated.
L. Once approved by the Credentialing Committee, the signed contracts are returned to the Network Management employee. The employee then uploads and approves the contracts on MTM's Credentialing Website within 24 hours. A copy of the Transportation Provider Services Agreement and Guidelines will be filed in the Transportation Providers' paper and electronic files.
M. MTM departments are notified of the new Transportation Provider and the effective date of when the Transportation Provider is available to start taking trips.
N. Drivers are credentialed upon entry into the MTM Transportation Provider Network and re-credentialed on an annual basis thereafter.

O. MTM's Credentialing Committee reviews all documents as they relate to the credentialing/re-credentialing process and make the decision to either approve or deny the credentialing/re-credentialing of the Transportation Provider/driver. MTM will verify all credentialing documents before approving a driver.
P. If the Transportation Provider/driver is denied, Network Management will provide that decision to the Provider in writing.
Q. The Transportation Provider has the right to appeal the decision within 30 days.
R. All appeals are presented to MTM's Credentialing Committee before forwarding to MTM's General Counsel for final decision.

Temporary Suspension/Termination:
REASONS FOR CLOSING (including, but not limited to the following): driver issues, vehicles issues, insurance issues and other compliance issues. When a Transportation Provider is closed, they must remain closed for a minimum of seven (7) days, unless otherwise approved by department management.

A. Network Management is the owner of provider closings and will provide oversight from start to finish.
A. Transportation Providers are continually monitored to ensure they remain in compliance with all MTM requirements.
B. Transportation Providers found to be out of compliance (situations including but not limited to endangerment of a member or cause of unnecessary liability to MTM) are closed immediately until such issues are resolved to MTM's satisfaction.
C. Continued non-compliance will result in MTM terminating the contract between MTM and the Transportation Provider. MTM will comply with the termination with or without cause in accordance with the Transportation Providers contract. MTM will notify the Transportation Provider, via Certified Mail, of the contract termination.
D. Transportation Providers have the right to appeal the decision of MTM to terminate their contract. Appeals must be received in writing within 90 days of the termination notice. All appeals are sent to MTM's General Counsel for the final decision.
E. The monitors considered to be of a "serious" nature would include but are not limited to the following:
    1. Lack of current insurance in accordance with the Transportation Provider's contractual agreement.
    2. Vehicle safety issues.
    3. Reports of drivers smelling of an alcoholic beverage.
    4. Reports of drivers using or smelling of a non-prescribed, illegal substance.
    5. Reports of drivers driving erratically and/or having near miss situations with other vehicles.

F. In the case where the issue is a lack of current insurance, the Transportation Provider is immediately closed in the NET System to all new trips 5 days prior to the insurance due expiration date. If the updated insurance is not received by the Network employee by close of business the 3rd business day before the expiration date, the provider will remain closed and have existing trips canceled for the day of expiration. If the updated policy has not yet been received by the Network employee two days before the expiration date, the trips for the day following the expiration are canceled and reset with compliant Transportation Providers. If by noon the day before the policy is due to expire, the Transportation Provider has still not submitted their new insurance policy, the remaining days (to make a total of 7 days' worth of trips) will be canceled and reset with compliant Transportation Providers. (Seven day closure may be reduced by the department management in areas of small or limited network. Closure may also be reduced if the possibility of a negative impact on transportation for members in the service area is a possibility.)
    1. Network Management will inform the appropriate departments of the Transportation Provider closing so that all scheduled trips are cancelled with the Transportation Provider and rescheduled with another Transportation Provider. The information sent out by Network Management will specifically state which department(s) is responsible for canceling the trips and whether or not there is a need to cancel trips greater than 7 days out.
    2. Network Management will evaluate Transportation Provider availability in an area where a Transportation Provider is being deactivated and contact other Transportation Providers in the area of the Transportation Provider deactivation (when necessary) that may be able to provide the appropriate mode of transportation. MTM will receive verbal agreement to accommodate the increased trip volume caused by another Transportation Provider's deactivation. This information will be included in the notification of closure.

G. Customer Service Center(s) is responsible for canceling the existing trips they set up and rescheduling the trips.

H. Upon completion of trip reassignments, each department must notify Network Management.

I. In the case where the concern involves one particular driver or vehicle, the Transportation Provider can remain open in the NET System but will be required not to use that particular driver or vehicle until the issue has been resolved to MTM's satisfaction.

J. Network Management will notify the Transportation Provider of the deactivation for non-compliance verbally and by fax. Network Management will also inform the Transportation Provider that MTM will begin canceling all current trips, and no future trips will be awarded until the appropriate document(s) have been obtained. Cancelled trips will not be re-

awarded to the Transportation Provider once appropriate documentation has been provided to MTM.

K. The Transportation Provider will be notified by fax of the reason for the cancellation of trips and the type of document(s) in question.
L. Network Management will note the reason for closure of the Transportation Provider in the internal notes section on the "My Account" page in MTM's credentialing website.
M. Network Management will notify applicable departments when a deactivated Transportation Provider is reinstated.
N. Network Management can close a Transportation Provider in the NET System, however, Network Management may not terminate the provider contract. Only MTM's General Counsel can terminate provider contracts.
O. Transportation Providers will be suspended and/or disciplined when their service level falls below MTM's acceptable level and/or when the safety of the member is in question.

Issues are categorized into two groups:

1. **Non-Safety Issue** is defined as any issue that does not directly endanger the immediate health and welfare of the member. MTM reserves the right to terminate any Transportation Provider upon the occurrence of any material non-safety complaint or incident. MTM shall determine, in its sole discretion, the materiality of any non-safety complaint or incident. For minor non-safety issue, such as provider's no-show, or cancellation of a trip (less than 24 hours notice) rate of more than 1.99%, provider discipline shall be as follows:
    a. At the first occurrence of 1.99% or more of their monthly total trip volume, Network Management will send an education letter of warning to the provider. Drivers will also be required to attend refresher training.
    b. At the second occurrence consisting of 1.99% or more of their monthly total trip volume, Network Management will send a Performance Improvement Plan (PIP) suspending the Transportation Provider to new trips for two (2) consecutive calendar days.
    c. At the third occurrence consisting of 1.99% or more of their monthly total trip volume, Network Management will send a PIP suspending the provider to new trips for five (5) consecutive calendar days.
    d. At the fourth occurrence consisting of 1.99% or more of their monthly total trip volume, Network Management will send a PIP suspending the provider to new trips for thirty (30) consecutive calendar days.
    e. If the Transportation Provider is still out of compliance after the PIP, MTM reserves the right to terminate the Transportation Provider.

f. Transportation Providers with two (2) or more grievances in one (1) month, or any group with four (4) or more grievances, shall be further reviewed by the MTM.
g. All correspondence referenced above will be kept in the Transportation Provider's file.

2. **Safety Issue** is defined as any complaint that directly endangers the immediate health and welfare of the member. MTM reserves the right to terminate any Transportation Provider upon the occurrence of a material breach in the safety of any member. MTM shall determine, in its sole discretion, the materiality of any breach in safety. For minor safety incident complaints, Transportation Provider discipline shall be as follows:
    a. Upon a first occurrence of a substantiated Transportation Provider safety complaint, Network Management will send a PIP suspending the Transportation Provider to new trips for two (2) consecutive calendar days.
    b. Upon a second occurrence of a substantiated Transportation Provider safety complaint, Network Management will send a PIP suspending the Transportation Provider to new trips for five (5) consecutive calendar days.
    c. Upon a third occurrence of a substantiated Transportation Provider safety complaint, Network Management will send a PIP suspending the Transportation Provider to new trips for thirty (30) calendar days.
    d. Apart from an extenuating circumstance, any additional occurrences of substantiated Transportation Provider safety complaints would result in the Transportation Provider being terminated from the MTM Transportation Provider Network.

P. Network Management staff will educate and document during all the above steps.
Q. Transportation Providers may be allowed to return to the MTM Transportation Provider Network only in the case of non-safety issues.
R. Transportation Providers may not be allowed to return to the MTM Transportation Provider Network in the case of removal for safety issues.
S. A terminated Transportation Provider must be out of the MTM Transportation Provider Network for at least one (1) year and cannot return without all required documentation and training in place.
T. All suspensions and/or disciplines are measured on a calendar month basis.
U. Notice of suspension given to a Transportation Provider commences a ninety (90) day time table for the Transportation Provider to correct the issue(s) which lead to the suspension.

V. If the Transportation Provider has not corrected these issues within the ninety (90) days allowed, the Transportation Provider will be recommended to MTM's Credentialing Committee for termination.
W. Once the termination is approved by MTM's Credentialing Committee, MTM's General Counsel will notify the Transportation Provider via certified mail.
X. All Transportation Provider education and discipline issues are documented and maintained in the Transportation Provider's file.

This procedure is reviewed by the appropriate department management on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Provider Network Date

Corporate Procedure

Subject:	Transportation Provider Meetings	**Procedure No.:**	101.002
Authorized By:	Director, Provider Network	**Date:**	1/27/2012
Department:	Network Management	**Last Revised:**	5/1/2014
Applicability:	Network Management		

PURPOSE:
Provide education and information to the Transportation Providers who are participating in the MTM Transportation Provider Network.

POLICY:
Policy 101 – Site Visits

RESPONSIBILITY:

A. Presentation topics are determined by educational needs, historical trends, compliance issues, and input from Transportation Providers.
B. Schedule the meeting and invite all active Transportation Providers, informing them of the dates, times, topics, and locations to give them an opportunity to select the meeting that best fits their schedule.
C. Assign responsibilities to MTM staff for information and materials presented during the meetings.
D. Monitor RSVPs to determine Transportation Provider interest.
E. Make follow-up phone calls to contact Transportation Providers who have not responded to the initial invitation to invite them to the meetings.
F. Conduct the meetings and provide opportunity for a written evaluation from all attendees with suggestions for future meetings and topics.
G. Document questions that arise during the course of the meeting and provide written feedback to all Transportation Providers in the Network.
H. Track attendance and feedback to assist in planning future meetings and for reporting outcomes to the Quality Management Committee (QMC).

This procedure is reviewed by the appropriate department management on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Provider Network Date

Corporate Procedure

Subject:	Credentialing: Insurance Requirements (Auto, General and Worker's Compensation)	**Procedure No:**	100.010
Authorized By:	Director, Provider Network	**Date:**	9/4/2013
Department:	Network Management	**Last Revised:**	2/20/2014
Applicability:	Network Management		

PURPOSE:

To ensure the transportation provider is educated and aware of the state requirements for Auto Liability, General Liability and Worker's Compensation Insurance. The transportation provider must meet all insurance requirements as outlined in the contractual documents prior to providing any transportation services for MTM.

POLICY:

Policy 101 – Transportation Provider Contracting

RESPONSIBILITY

A. Transportation providers are required to obtain all required insurance coverage from a legitimate and reputable insurance agency. **Please note MTM will not accept insurance through Progressive Insurance.**
B. A copy of the Accord or Certificate of coverage must be provided to MTM through MTM's online Credentialing application website (www.onlineaccess.mtm-inc.net).
C. Provider Network staff will review and verify all documents for accuracy and compliance with the documented requirements. NOTE: not all cities/states have the same requirements as far as insurance amounts so these amounts will vary by the area being served by MTM and the transportation provider.
    - Auto Liability must be no less than $300,000 combined single limit per vehicle. If scheduled autos are marked, they must be listed on the policy.
    - General Liability must be no less than $300,000 for each occurrence.
    - Worker's Compensation is required if one or more employees are hired or as dictated by the state in which services are taking place. Please provide Worker's Compensation State Certificate of Coverage to MTM – **IMPORTANT NOTE:** MTM must **NOT** be listed as "additional insured" or be a "certificate holder" for Worker's compensation policies.

NOTE: Auto and General Liability Insurance documents must have MTM listed as the certificate holder and additional insured. For Worker's Compensation – do NOT list MTM as the certificate holder or additional insured

D. MTM will verify and approve the documents submitted once they meet the specified requirements for the areas being served by the transportation provider. Approval will be displayed through the online Credentialing application website.
E. All documents are renewed on an annual basis.
F. Transportation providers are required to upload the renewed documents onto the Credentialing application website prior to their expiration date. MTM will verify the renewed documents before approving.
G. The transportation provider will be removed from service if at any time they do not have current and appropriate insurance in place.

This procedure is reviewed by the appropriate department director on an annual basis for appropriateness and effectiveness.

APPROVED BY:

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Director, Provider Network Date

Corporate Procedure

Subject:	Credentialing: Driver Credentialing Requirements	Procedure No:	100.013
Authorized By:	Director, Provider Network	Date:	9/6/2013
Department:	Network Management	Last Revised:	5/1/2014
Applicability:	Network Management		

PURPOSE:

To maintain compliance by having the transportation provider submit documentation required for approval of drivers prior to providing transportation services. The documents are submitted and monitored through the Credentialing application website, and renewed based on the expiration dates or state requirements.

POLICY:

Policy 101 – Transportation Provider Contracting

RESPONSIBILITY

A. Transportation providers must submit a background check on the Credentialing application website for every driver that will be used to service MTM members.
    - Transportation provider must not use any driver or attendant with any of the following convictions or substantiated incidents:
        - Child abuse or neglect
        - Spousal abuse
        - Crimes against children
        - Crimes against the elderly or infirm
        - Crimes involving rape, sexual assault, or other sexual offenses– this check must be done via the National Sex offender Public Website www.nsopr.gov and done independently from background check, and must be submitted to MTM yearly for credentialing and re-credentialing purposes
        - Homicide
    - Transportation provider must not use any driver or attendant who has the following return notification from any background screening:
        - "Category" is shown as physical abuse or sexual maltreatment

        - "Severity" is shown as moderate, serious/severe, permanent damage, or fatal abuse or maltreatment
        - "Conclusion" is listed as court adjudicated or probable cause.
    - Transportation provider must not use any person as a driver or attendant in the conduct of MTM services who has a felony criminal conviction of a felony offense within the immediate past five (5) years. Further, any conviction, plea of guilty, finding of guilty, or plea of "nolo contendere" (misdemeanor or felony) for any of the following driving offenses within the previous five (5) years shall disqualify a driver from performing MTM services:
        - DUI or DWI, or other alcohol related offense
        - Reckless driving

B. Transportation providers must submit a certificate for Defensive Driving Training (Certificate provided by the certified trainer) on the Credentialing application website. This must be renewed every 3 years.

C. Transportation provider must submit a copy of the Driver's License(s) for each driver on the Credentialing application website. (Must have valid driver's license).

D. Transportation provider must submit a copy of the Social Security card for each driver on the Credentialing application website.

E. Transportation providers must submit Driving Records (must be less than one year old) on the Credentialing application website.
    - Transportation provider must not use any driver with the following:
        - Convicted of more than two (2) minor motor vehicle moving violations within the previous twenty-four (24) months
        - More than one (1) at-fault incident (accident) resulting in personal injury or property damage within the previous thirty-six (36) months, or three (3) or more cumulative vehicle accidents within the previous five (5) years
        - A combination of one (1) unrelated minor motor vehicle moving violation and one (1) at-fault incident (accident) resulting in personal injury or property damage within the previous twenty-four (24) months
        - Revocation or suspension of the driver's vehicle operator's license within the previous three (3) years for accumulation of points or alcohol related incident

F. MTM will perform the OIG (Office of Inspector General) check monthly for each transportation company and driver. MTM will track results and deactivate any transportation provider or driver who has prohibitive sanctions against them.

    Performed monthly by ComplianceLine (SanctionCheck.com) Monthly checks will also be done for the States of Texas and Ohio via SanctionCheck.com

G. The transportation provider must submit a copy of their First Aid Training certificate or card. This must be renewed by expiration date.
    - Must have valid card/certificate.
H. MTM will perform the System for Award Management (SAM) check for each driver. MTM will monitor and track results and deactivate any transportation provider and/or driver who has prohibitive sanctions against them.
    - Performed monthly by ComplianceLine (SanctionCheck.com)
I. The transportation provider must submit a certificate of training for Assisting Passengers with Disabilities on Credentialing application website.
    - Must be renewed every 3 years.
J. The transportation provider must submit a certificate of training for Emergency Situations on the Credentialing application website.
    - Must be renewed every 3 years.
K. The transportation provider must submit a certificate of training for Wheelchair Securement on the Credentialing application website.
    - Must be renewed every 3 years.
L. Transportation provider must submit a Pre-Employment Drug Screen for each driver on the Credentialing application website.
        - Transportation provider must assure current laws regarding drug and alcohol testing are enforced for any of their drivers or attendants.
        - If MTM or the transportation provider has reasonable suspicion of a driver or attendant to be under the influence of alcohol or drugs, the transportation provider must immediately remove the driver or attendant from MTM service and submit the driver or attendant to an alcohol and/or drug screening at the transportation provider's expense.
        - Refusal to submit to testing within the designated time frame is considered a positive test result and will have the same disciplinary consequences.
        - Drivers or attendants testing positive for drugs and/or alcohol will no longer be permitted to transport MTM members or provide any other service to MTM members.
M. Transportation provider must meet all of the requirements listed above prior to taking trips for MTM. The Credentialing application website will generate electronic notifications to inform the transportation provider of the approval or rejection of credentials and drivers.

NOTE: MTM will verify all required credentialing documents before approving transportation providers, drivers and vehicles.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Provider Network Date

5.0 Customer Service

Overview

MTM's professional and courteous Customer Service Center (CSC) provides prompt and efficient eligibility verification in accordance with client specifications. This includes taking requests for transportation services from members or their representatives, medical providers, and facilities.

During the intake process, Customer Service Representatives (CSRs) gather pertinent member information including the member's ID number, pick-up address, destination address, appointment date and time, and special needs, then enters this information into MTM's NEMT Management System.

CSR Responsibilities

The CSR's main functions include:

- Answering calls promptly and professionally while respecting the caller's right to privacy, confidentiality, and sensitivity to cultural diversity.
- Educating members on the program they belong to, including explaining member responsibilities for scheduling transportation and coordinating pick-up and delivery.
- Gathering and entering required information into MTM's NEMT Management System to verify eligibility and adequately analyze the member's transportation needs for trip assignment. Trips should be assigned to the least costly transportation provider that adequately meets the member's needs.
- Escalating trip requests for higher modes of service than believed necessary to the appropriate department.
- If a request is denied, denying the request, entering the reason(s) for the denial in the system, and notifying the member the same day. If a complaint call is received, following the procedures for documenting and resolving member complaints.
- If a complaint call is received, following the procedures for documenting and resolving member complaints.
- Escalating special requests to the appropriate department.
- Following MTM and DHCFP protocols, policies and procedures.

Hours of Operations

Nevada CSC hours of operation for scheduling urgent, non-urgent trips and logging complaints are Monday through Friday from 7 a.m. to 6 p.m. The MTM observed holidays are listed below. After-hours call center services will be available 24/7/365 through our corporate CSC for urgent and hospital discharge trips, as well as filing complaints.

Observed Holidays

MTM's Nevada CSC will be closed on the following holidays (our corporate CSC operates 24/7/365):

- New Year's Day *(January 1)*
- Memorial Day *(Last Monday in May)*
- Independence Day *(July 4)*
- Labor Day *(First Monday in September)*
- Thanksgiving Day *(Fourth Thursday in November)*
- Christmas Day *(December 25)*

CSC Phone Lines

A toll-free telephone number has been installed so members can schedule transportation. They will never be charged for calls to this toll-free number. ***The toll-free number is 1-844-549-8353.***

A separate queue (the Where's My Ride Line) has been established for member and medical provider inquiries about the status of a trip or the whereabouts of a transportation provider. ***This toll-free number is 1-844-549-8354.***

Customer Satisfaction Survey

A statistically valid random sample of members will be contacted each week via telephone for a follow up customer satisfaction survey. The survey will include evaluation of the service provided, including satisfaction with the call intake process, driver and vehicle assessment, and timeliness of the service received. The population surveyed will include a subset of limited English proficiency members. Findings of the survey will be reported to DHCFP on a quarterly basis.

Customer Service Audits and Evaluations:

To ensure professional call intake activities, MTM performs continuous call monitoring for each CSR. This allows MTM to constantly improve the level of service provided to members and provides an opportunity to coach and mentor CSRs on identified challenges regarding quality control and training purposes. MTM will monitor, at minimum, 10 recorded calls for each CSR per month in conjunction with an audit of the associated trip record. CSRs who begin taking calls in the middle of a month shall have the number of evaluations pro-rated, based on the date that they began taking live calls. (Example: a CSR who starts handling calls on the 15th of the month should expect to have five recorded calls monitored.) CSRs are expected to achieve an evaluation score of 95%. Auditing scores and evaluations will be submitted to DHCFP on a monthly basis by the 15th day of the following month. CSRs become eligible for evaluations on the date that they begin taking client calls.

CSR Training

MTM's CSC staff, including CSRs, receive thorough training on MTM's policies and requirements to ensure appropriate and timely service. CSRs will give first-time callers an orientation on the program, member responsibilities, and the importance of adhering to guidelines.

Customer Service Center Procedures

Policy 201	Call Handling
Policy 202	Customer Service Center Telephone Conduct
Policy 203	Customer Service Center Reporting
Policy 204	Call Center Service Disruption
Policy 205	Call Center Operations
Policy 206	Inclement Weather
Policy 207	Process for Customer Mistreat
Policy 220	Fax Confirmation Management
Policy 230	Customer Service Center Training Requirements
Policy 255	Service Animals with Transportation Request
Procedure 200.021	Post Transportation Authorization Requests
Procedure 200.004	Scheduling Transportation Requiring Special Needs
Procedure 200.005	Translation Services
Procedure 200.019	80 Day Review Process
Procedure 200.034	Relaying Transportation Related Issues
Procedure 200.037	Handling Discharge Request
Procedure 200.039	Member Eligibility
Procedure 201.001	Customer Service Center Trip Escalations
Procedure 201.003	Emergency Situations
Procedure 201.004	Accurate Documentation of NEMT Management System
Procedure 201.005	Transportation Provider Trip Turn-Backs
Procedure 202.001	Consumer (Member) Satisfaction Surveys
Procedure 204.001	Power Outage System Failure
Procedure 206.001	Inclement Weather – Missed Appointments
Procedure 230.002	Training Duration Requirement
Procedure 753.002	CSC Cultural Competency

Corporate Policy

Subject:	Call Handling	**Policy No.:**	201
Authorized By:	President/CEO	**Date:**	7/29/2001
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
The purpose of this policy is to develop and maintain a call handling policy that will adhere to both MTM and client specific protocol requirements.

POLICY:
MTM Customer Service employees will handle all calls by obtaining complete and accurate information, ensuring compliance of specific protocol requirements for our clients, as well as ensuring they are in adherence to MTM policies and procedures.

DEFINITNIONS:
Client: Refers to the customer contracted with MTM to handle the covered benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms, for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:
Scheduling transportation Request:
CSRs will handle all calls with dignity, respect, and in a professional manner.

When appropriate, CSRs will greet callers using the specific greeting that displays on their screen prompt through the call intake system or as outlined in the client protocols.

CSRs will identify if the member requires relay services, or language assistance. If necessary, the CSR will utilize the training document on handling relay or language assistance calls, which is found in the Call Center 101 reference book.

Before approving the member's transportation request, the CSR will ensure the member qualifies for transportation in accordance with client protocols by verifying eligibility and service requirements, adhering to days' notice requirements, as well as verify the member is going to a facility that accepts Medicaid or Medicare in accordance to client protocols.

CSRs will educate the member if services are to be denied for any reason and inform them that they have the right to appeal and give the appropriate toll-free number to the client. The member will also be given instructions based on client's protocols.

CSRs will verify if the member requires any special accommodations including specific vehicle type, an attendant, or requires traveling with a service animal. If specific accommodations are needed, the CSR will adhere to all documentation requirements in the NET Management System.

CSRs will use the NET Management System to select the most appropriate mode of transportation to include offering mileage reimbursement, ADA or Para Transit Systems, Public Transportation, sedan, para-lift vehicles, stretcher, or ambulance that are in adherence to what modes the clients offer their members.

The CSR will recap all trip information with the member and make the necessary corrections if required at time of the call. The CSR will also educate the member on the specific requirements for the day of travel including when to be ready for pick up, the phone number of the transportation provider and the requirements of a call back should the appointment need to be canceled or rescheduled.

Lastly, the CSRs will document the member's file/trip information should it be needed for future reference.

Caller Emergency Situations:
Should a CSR determine a transportation service request is related to an emergency condition and if appropriate instruct the caller to hang up and dial 911. If the caller cannot call 911, the CSR will immediately contact a member of the leadership staff to take control over the call. The leadership staff will call 911 on the member's behalf and stay on the line until the emergency personnel arrive at the member's location.

The leadership staff will document the situation in the member's file as well as report the incident to the necessary internal departments for communication to the client.

Trip Cancellation Request:
Upon the request to cancel a scheduled trip, the CSR will ensure that the trip request is properly documented with the person who called in the request to cancel as well as ensure the appropriate trip cancellation reason code is used.

CSR will contact the transportation provider if the trip request is for same day or the next day as well as ensure the cancellation fax is sent to the provider.

Stranded Passenger Request:
If a CSR receives a call from a member stating that they have been stranded, the CSR will identify where the member is located and contact the transportation provider to determine the status of the pick-up. If the transportation provider cannot be reached, the CSR will cancel the trip using the appropriate cancellation status code and will enter a one way transportation request and locate a new transportation provider to accommodate the trip request.

The CSR will also document the situation in the NET Management system as well as ask the member if they would like to file a formal complaint against the transportation provider. If the member does want to file a complaint, the CSR will transfer the caller to the QM department.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Customer Service Center	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Customer Service Center Telephone Conduct	**Policy No.:**	202
Authorized By:	President/CEO	**Date:**	4/13/2001
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
To ensure MTM's Customer Service Center adheres to excellent customer service guidelines on all incoming and outgoing calls.

POLICY:
The CSC leadership staff will ensure that all employees treat members with dignity and respect. Professionalism will be enforced at all times and monitored through visual observation, side-by-side observations, random call sampling and live calls reviewed by the Quality Auditing Team.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the covered benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms, for MTM purposes, member is being used as a standard meaning for the Client's covered population.

CSC: Refers to Customer Service Center.

CSR: Refers to Customer Service Representative.

RESPONSIBILITY:
CSRs will provide courteous, professional and helpful service without regard to race, religion, gender, color, sexual preference, national origin, age or physical or mental health status.

CSRs will maintain a courteous and pleasant speaking voice throughout the entirety of the call regardless of member behavior.

CSRs will use the member's last name throughout the conversation of the call unless obtaining permission to use the caller's first name.
CSRs will maintain control over the call by avoiding personal conversations with members.

CSRs will avoid putting members on hold without educating the member on the reason for the hold. Once a member is placed on hold, the CSR will follow up with the member to provide an update on the situation.

CSRs will not put a member on hold in order to have a personal conversation with other call center employees.

If the member becomes angry, or abusive in language and behavior, the CSR will not disconnect the call until providing fair warning and allowing the member a chance to correct the behavior.

If a member requests to speak to a Supervisor, the CSR will first see if they can resolve the member's request before proactively offering to escalate to a Supervisor. However, if member is adamant that they want to speak to a Supervisor, the CSR will never deny the request of a member to speak with a Supervisor. The CSR will politely ask the member to hold while they contact their Supervisor and will escalate the call immediately.

CSRs will never avoid answering calls. CSRs will be available to handle all incoming call requests when scheduled to be online unless following up on a previous request.

CSRs will avoid inappropriate conversations and loud noises within the call center at all times as there is a risk of the conversation being overheard by members on the phones with other CSRs.

CSRs will avoid speaking to members while eating or drinking as this is inappropriate behavior.

Any violations of the above will result in disciplinary actions including termination depending on the severity of the situation.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Customer Service Center	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Customer Service Center Reporting	**Policy No.:**	203
Authorized By:	President/CEO	**Date:**	02/15/2001
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
The purpose of this policy is to ensure the CSC is in compliance with all reporting requirements.

POLICY:
The CSC will produce, monitor, and report all performance metrics to be in compliance with Client protocol requirements.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the covered benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms, for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:
The CSC Leadership staff will partner with the Information Technology Department to develop reports that meet the specific needs of MTM and our clients.

The CSC Leadership staff will meet all required deadlines for producing and communicating reports for internal personnel as well as our clients.

The CSC Leadership staff will utilize call statistic reports and quality monitor reports to identify areas of opportunity for MTM call center staff and will take the necessary corrective actions to ensure MTM is meeting all performance standards.

The CSC Leadership staff will ensure all client specific reports are posted via FTP site or other specified areas for access of MTM personnel on a daily, weekly and monthly basis.
The CSC Leadership staff will not falsify data that is being reported.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Customer Service Center	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Call Center Service Disruption	**Policy No.:**	204
Authorized By:	President/CEO	**Date:**	7/11/2002
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
The purpose of this policy is to provide an organized plan on how to provide continuous service to MTM clients in case of phone and/or system outage.

POLICY:
MTM will ensure members have access to MTM's customer service centers in the event of an outage.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the covered benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms, for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:
The Customer Service Center (CSC) leadership staff will immediately report all service outages to MTM's Information Technology (IT), and Client Services (CS) at the time the outage/service disruption is identified.

Each client will have a designated primary and secondary (back up) CSC. The secondary CSCs will have staffed trained on all client protocols designated for the CSC.

Should an outage occur, the CSC staff will immediately ensure secondary CSCs are staffed appropriately and skilled to handle the secondary call volume. This may include calling in additional staff or requiring overtime until the outage is resolved.

Calls will be routed to the CSCs designated as the secondary back up for each client.

If necessary, the CSC staff will go to paper documentation to ensure all calls are handled in a timely and accurate manner. If appropriate, all requests will be resolved within 24 hours or within requirements of client protocols.

The IT staff will determine the nature of the outage, estimate time of restoral of services, and communicate with Client Services and the CSC frequently until outage has been resolved.

The IT staff will complete a business disruption form for client communication requirements including nature of disruption, time reported, impacts to client, and estimated time of restoral.

If the outage is related to inclement weather, the CSC leadership staff and Client Services will partner with the Client to obtain approval to activate emergency IVR messages. The emergency IVR messages will defer non urgent trip requests during the outage.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Customer Service Center	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Call Center Operations	**Policy No.:**	205
Authorized By:	President/CEO	**Date:**	5/13/2013
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
The purpose of this policy is to ensure that MTM's customer service centers are meeting contractual requirements as outlined by clients.

POLICY:
MTM Customer Service Centers will enforce call center standards that meet the needs of our clients.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the covered benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms, for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:
Hours of Operation:
MTM will ensure compliance with the hours of operation as outlined in client protocols
MTM will ensure we are adequately staffed with call center personnel during all hours of operation to meet service level requirements as outlined in contract.

Location of Call Center:
MTM will meet facility location requirements as specified in client contract.
MTM will ensure that the facility is secure at all times to be in compliance with HIPAA as well as to protect the safety of employees and MTM/Client property.

Operating Procedures:
MTM will ensure that employees have all the necessary equipment and resources to meet the requirements of their job functions.

MTM will provide separate phone numbers for clients to reach key personnel as outlined in contract.

MTM will meet the technology requirements to ensure member calls are answered by a live CSR without any interruption in service.

Call Center Performance Standards:
MTM will ensure all service level requirements are met as outlined in client contract.
MTM will ensure all call center historical data is collected, reviewed and provided to client.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Customer Service Center	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Inclement Weather	**Policy No.:**	206
Authorized By:	President/CEO	**Date:**	03/09/2004
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
To ensure safety is always the first consideration when determining whether or not to perform services during times of inclement weather and to ensure proper notification to members in the event transportation is not possible due to the inclement weather situation.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the covered benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms, for MTM purposes, member is being used as a standard meaning for the Client's covered population.

POLICY:
MTM staff will consider the safety of the members first and above all things when the decision is being made whether or not to transport during times of inclement weather. Members will be notified by either MTM or the transportation provider of any decision not to complete the transportation services due to inclement weather.

NOTE: Special consideration will be given to life sustaining (i.e., dialysis, chemotherapy & radiation) transports and urgent requests.

RESPONSIBILITY:

A. MTM staff will consider the safety of the member above all other things during times of inclement weather (when forecasted) before assigning transportation to a public transit organization where the member would be expected to walk to and/or wait at a public transit waiting area.
B. MTM staff is educated and encouraged to keep the lines of communication open between the transportation providers and members regarding inclement weather and/or unusual traffic conditions so each party is informed of decisions to either transport or not to transport.
C. MTM staff is educated on the proper handling of transports which cannot be completed due to inclement weather and/or unusual traffic conditions. The transportation provider will contact MTM via telephone, fax or e-mail if they cannot complete the transportation because of inclement weather and/or unusual traffic conditions.
D. When the member does not want to complete the transportation due to the inclement weather and/or unusual traffic conditions, they are expected to contact MTM and/or the transportation provider via telephone. Note: Members are educated on each call to MTM to contact MTM if they need to make any changes to or cancel a scheduled trip.
E. Transports are canceled when notification is made to MTM by either the transportation provider or the member. Transportation providers are also notified via telephone, fax or e-mail in the event a member contacts MTM directly to cancel due to inclement weather and/or unusual traffic conditions.
F. Every effort is made by the transportation providers to complete all trips during inclement weather and/or unusual traffic conditions whenever safety permits. Members who have already been taken to their appointment before the inclement weather situation occurs must be returned to their original pick up location by the transportation provider. If the original transportation provider cannot accommodate the return ride, MTM will locate another transportation provider that is able to accommodate the return ride for the member.
G. Life sustaining and urgent need transports are considered of the utmost importance and those transports are given the highest level of importance and are completed if at all possible, even in inclement weather and/or unusual traffic conditions, whenever safety allows. Every effort is made to complete these types of transports while still ensuring member and transportation provider safety.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Call Center Operations	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Process for Consumer Mistreat	**Policy No.:**	207
Authorized By:	President/CEO	**Date:**	7/1/2010
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
To ensure that CSRs are following the guidelines and handling calls with the utmost respect.

POLICY:
The CSC management team will ensure that the CSC staff treats all callers with dignity and respect. Professionalism will be enforced at all times and monitored through side-by-side observations, random call sampling, and live calls reviewed by the Quality Auditing Team.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the covered benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:
In the event that any of the following issues arise or are discovered in the CSC, they will not be ignored and immediate steps of action will be taken.

- Hanging up on member
- Using profanity
- Mocking, mimicking, or making fun of callers (with caller on mute or otherwise)

The following steps will be taken to closely monitor interaction with all callers to ensure excellent customer service is being demonstrated at all times.

- Side-by-Side Monitoring
- Random Call Sampling
- Live Call Review (Quality Auditing Observations)

The following steps will be taken if any violations are found:

A. An immediate face-to-face meeting with the supervisor, CSR, and Manager/HR staff if necessary.
B. Thorough, accurate documentation will be captured regarding the situation and outcome.
C. Depending on the severity of the issue, disciplinary action may be taken; up to and including immediate termination.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Customer Service Center	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Fax Confirmation Management	**Policy No.:**	220
Authorized By:	President/CEO	**Date:**	12/19/2007
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
To establish a mechanism for all fax confirmation processes including documentation, changes, confirmation and cancellations.

POLICY:
Faxes for trip coordination are important and are channeled through MTM's Customer Service Center Operations Team (CSCOT).

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the covered benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:
Designated fax number(s) are available for care managed medical facilities to fax necessary information for trip coordination.

A. Confirmation of faxes will be sent to listed fax number which should be identified within received fax face sheet prior to identified timeframe.
B. Fax confirmation will include first and last name of member, appointment date, appointment time and transportation provider.
C. Faxes will be maintained and monitored internally by MTM via an identified systematic process of incorporating the medical facility, organization or member's name, and date of receipt of fax.

D. Confirmation of receipt and faxed confirmation shall be documented within NET Management System notes within the appropriate timeframe.
E. MTM will provide a verbal call to confirm any fax which, for some reason, a confirmation cannot be received.
F. Any fax received in which there is a request for cancellation, will have confirmation sent identifying that cancellation has been processed.
G. Any fax received in which there is a change of information, will be confirmed and a confirmation sent.
H. Transportation Provider change will occur through the normal Network Management process.
I. Complaints will occur through the normal Quality Management process.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Customer Service Center	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Customer Service Center Training Requirements	**Policy No.:**	230
Authorized By:	President/CEO	**Date:**	1/27/2003
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
To ensure every customer service employee is appropriately trained in all areas of their job responsibility to include following MTM policies and procedures as well as contractually obligated client requirements.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the covered benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms, for MTM purposes, member is being used as a standard meaning for the Client's covered population.
CSR: refers to Customer Service Representative.

POLICY:
MTM's customer service center will adhere to internal training requirements in accordance with Policies 715 Orientation of New Employees and Policy 753 Documentation of Ongoing Training. When appropriate, MTM will adhere to Client training requests and/or training requirements.

RESPONSIBILITY:
Leadership staff will conduct new hire orientation during which CSRs will learn the following:

- Corporate policies and procedures including Customer Service
- HIPAA requirements
- Cultural Competency
- Fraud, Waste, and Abuse

- Code of Conduct
- Introduce CSRs to MTM's various departments providing the roles and responsibilities of each department.
- Educate CSRs about the types of services MTM provides
- Basic responsibilities of handling a transportation request

In depth training on the NET Management System software includes but is not limited to the following:

- Learning the various trip maintenance screens and specific data requirements for completing a transportation request
- Entering transportation request into NET Management System screens
- Monitoring live calls with an experienced CSR in the Customer Service Center and with Trainer in training area.
- Practice data entry on live calls with experienced CSRs in the Customer Service Center.
- Take live calls asking questions as needed in training area.

Provide in depth training in customer service soft skills by reviewing MTM's quality monitoring program requirements and through role playing exercises.

Train on specific Client protocols to include covered/non covered services, prior authorization processes, handling special need requirements, and determining appropriate modes of transportation.

Train CSRs to effectively use phone systems and various other software programs to complete daily task.

Provide CSRs with assessment quizzes to verify training material was comprehended. Each CSR will meet the minimum assessment score requirement based on MTM and client requirements before handling incoming calls.

Provide continual training through coaching and development activities including call monitoring sessions, pulling trip queries, having CSRs listen to their own calls, side by side sessions, and reviewing quality audits.

Ensure CSRs are trained on protocol changes as well as additional policy or procedure changes.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Customer Service Center	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Service Animals with Transportation Request	**Policy No.:**	255
Authorized By:	President/CEO	**Date:**	5/1/2011
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
The purpose of this policy is to ensure the customer service center staff is compliant with the Americans with Disabilities Act (ADA) requirements in association to transporting service animals at the member's request and ensuring proper documentation is entered into the NET Management system for transportation providers as well as future reference. Under title II and III, entities must permit service animals to accompany people with disabilities in all areas where members of the public are allowed.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the covered benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms, for MTM purposes, member is being used as a standard meaning for the Client's covered population.

POLICY:
MTM will adhere to the requirements of our clients and ADA laws by inquiring if a service animal is required during transportation.

RESPONSIBILITY:
During the call intake process, the Customer Service Representative (CSR) will review all permanent notes in the Red Flag section of the member's file to determine if a service animal is required during transport.

If there is no documentation that a service animal is required, the CSR will ask the member if they have any special needs when scheduling transportation. If no, the CSR will proceed with the transportation request adhering to Policy 201 call handling.

If the member requires a service animal, the CSR will document this information on the Special Needs line in the NET Management System to read, “Has a service animal.” The CSR will also document the Red Flag section of the NET Management System for future reference.

MTM will contact local vendors to ensure they can accommodate a service animal by either faxing transportation request or by calling transportation providers and inquiring verbally.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Customer Service Center	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Procedure

Subject:	Post-Transportation Authorization Requests	**Procedure No.:**	200.021
Authorized By:	Director, Call Center Operations	**Date:**	09/10/14
Department:	Customer Service Center	**Last Revised:**	
Applicability:	Customer Service Center		

PURPOSE:
To respond to requests for non-emergency transportation in which transportation was provided by a contracted transportation provider without Member first contacting MTM due to MTM Customer Service Center being closed.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:

A. Requests for post-authorization are received via phone, fax, or encrypted email and must be completed within two business days of the date of service.
B. Verify Member eligibility for the date of service prior to assigning a post-authorization Trip ID number for transportation provider.
    - If YES - go to next step.
    - If NO - inform transportation provider that Member is ineligible on the date of service and no post-authorization will be available.
C. Enter trip information in NET Management System, including, but not limited to the following:
    - Date and time of appointment
    - Pick-up and drop off destinations
    - Pick-up and drop off times

- Name (and title of caller if possible)
- Phone number of caller
- Nature of appointment

D. A Trip ID number will be assigned for billing purposes. The Trip ID number will be assigned immediately for phone requests and within two business days for requests received via fax or encrypted email.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Call Center Operations Date

Corporate Procedure

Subject:	Scheduling Transportation Requiring Special Needs	**Procedure No.:**	200.004
Authorized By:	Director, Customer Service Center	**Date:**	4/13/2001
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
MTM Customer Service Center staff needs to ensure that the most appropriate means of transportation is arranged for members based on any special need requirements.

POLICY:
Not Applicable.

RESPONSIBILITY:
The Customer Service Representative (CSR) will:

A. Determine any special needs or conditions (e.g. pregnant, uses crutches, in wheelchair, blind, requires a service animal).
B. Note any special needs details on the Special Needs line in the system to provide detailed information to the transportation provider.
C. Note special needs in the Red Flag section of the NET Management System for future request.
D. Identify when member cannot speak English and if appropriate, utilize translation services. If appropriate and provided by client protocol, the CSR will determine if a translator is required on date of appointment or if MTM's network has a transportation provider that speaks member's language.
E. Determine if member is in a wheelchair and if appropriate the type of wheelchair. If the member does require a wheelchair, the CSR will determine of the member can transfer and use ambulatory services. The CSR will also determine if/how many steps are from the member's house to the curb. Lastly the CSR will -document the approximate weight of the member and the wheelchair. All information will be noted on the Special Needs line in the NET Management system.

F. Determine if the member requires a non-emergency stretcher or ambulance. If required, the CSR will input the trip information and escalate the trip to the appropriate personnel to obtain authorization and complete the transportation request.
G. Determine if the member requires transportation to or from a facility that is outside of the mileage limitations of the client's protocol. If transportation is required, the CSR will take down the basic trip information and escalate to the appropriate personnel to obtain authorization and to complete the transportation request.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Customer Service Center Date

Corporate Procedure

Subject:	Translation Services	**Procedure No.:**	200.005
Authorized By:	Director, Call Center Operations	**Date:**	7/12/2011
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
To educate customer service staff on the proper process for handling calls where there is an identified language barrier. TTY stands for Text Telephone. This device allows people who are deaf, hard of hearing, or speech-impaired use the telephone, by allowing them to type messages back and forth to one another or to a Relay Operator at the Telephone Relay Service Center.

POLICY:
Not Applicable.

RESPONSIBILITY:
Translation or -Third Party Language Services:

A. Identify the language the Member is speaking. If applicable, transfer the call to the appropriate internal translation queue.
B. After determining that the caller requires language line services and the CSR is not fluent in the language needed, the CSR will initiate a conference call by using the following steps:
    - Press the “more” option on the Cisco phone, followed by the “Confrn” option
    - Contact the third party language vendor at designated toll free number provided
    - Press “Dial” on the phone
    - When prompted, provide MTM’s Account Number
    - Select option “1” for Spanish or option “9” for all other languages
    - Enter the Location Code followed by # key as follows:
    - TX HHSC Contract Frew Calls = 1000
    - TX HHSC Contract Non Frew Calls = 1001
    - All other contracts= 0000
    - Press enter to confirm your entry

- Your call will be routed to a third party language services Operator
- Once advised, inform the operator that you are adding the caller on the line
- Press the “Confrn” option on the Cisco phone
- All parties should be connected
- Once all three parties (translator, member, and CSR) are connected the CSR will initiate the conversation by stating the proper greeting.
- CSR will pause to allow the translator to repeat information to member in their preferred language. Once, the member communicates the reason for call, the translator will inform CSR.

The CSR will follow the trip intake call flow until completion ensuring pausing and allowing time for translator and member to communicate.

TYY Calls

A Relay Operator will contact MTM and provide instructions for conducting the call. They will then use a TYY device to communicate with the member and will verbally communicate the member’s information to the CSR.

All Users: 711
TTY Users: 1-800-855-2880
Voice Users: 1-800-855-2881

AT&T Spanish Relay Service:
TTY Spanish: 1-800-855-2884
Voice Spanish: 1-800-855-2885

AT&T Speech-to-Speech Service
English STS: 1-800-229-5746
Spanish STS: 1-866-260-9470

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Call Center Operations Date

Corporate Procedure

Subject:	80 Day Review Process	**Procedure No.:**	200.019
Authorized By:	Director, Call Center Operations	**Date:**	10/19/2012
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
To ensure Supervisors are using the same criteria when evaluating employees during their introductory period.
Definitions:
CSR: refers to Customer Service Representative
Introductory Period: refers to an employee's first three months of employment
Key Performance Indicators: refers to the performance thresholds that an employee is expected to meet

POLICY:
Not Applicable

RESPONSIBILITY:
80 day reviews should be conducted in a timely manner. The reviews need to be created, reviewed, and uploaded into HRB within two business days of the employee reaching 80 days of employment. This will help the instances in which a Supervisor would like to recommend the employee be released because they are not meeting requirements. Supporting documentation as to why an employee is not recommended for continued employment should also be included.

Key Performance Indicators
In order to ensure that everyone is being consistent with 80 day reviews, we have identified the Key Performance Indicators (KPIs) on which a CSR should be evaluated. These measurements include the following requirements:

- Attendance - less than 6 tardy points and zero absences
- Quality Scores - greater than 90%
    - Will be an overall average score for the 80 day review period

- Average Handling Time - varies by call center (review Schedule A)
    - Will use the most recent 30 day average
- Level of Discipline - should not be on a level of discipline

In accordance with the CSR Tier Structure, all Customer Service Representatives (CSRs) are hired as CSR I. Therefore, the 80 day review should be a reflection of how the employee is doing with meeting the CSR I KPI requirements outlined above.

Documentation Form Requirement
The 80 day introductory form is located in HRB/Manager Resources/Reviews.

The form should list the employee's name; hire date, supervisor's name and department. If the employee is not meeting the requirements Supervisors should check "no" under the Performance section of the review document. In addition, the remainder of the form should outline the employee's performance with a recommendation to continue employment or not.

<u>If an employee is not recommended for continued employment, the form must be reviewed by HR prior to issuing to employee.</u>

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Call Center Operations Date

Corporate Procedure

Subject:	Relaying Transportation Related Issues	**Procedure No.:**	200.034
Authorized By:	Director, Call Center Operations	**Date:**	04/08/2005
Department:	Customer Service Center	**Last Revised:**	05/1/2014
Applicability:	Customer Service Center		

PURPOSE:
To ensure that any transportation provider issue (such as dispatch problems, computer issues, or vehicle troubles, etc.) are relayed to those who need the information in a timely manner.

POLICY:
Not Applicable

RESPONSIBILITY:

A. When a transportation provider calls to report difficulties in the execution of duties contracted by MTM, the CSR will obtain specific details on the provider's issue.
    - The CSR should be sure to get a full description of who is calling to include, but not limited to:
    - Specific detail of what the problem is
    - When the issues started
    - When the issues will be resolved
    - How the problem affects delivery of services
    - What the provider needs to do to address the issues
    - How MTM needs to address the situation, when the issues will be resolved, where the problem is affecting the provider's service
    - Which trips will the provider not be able to accommodate on the schedule due to problems. The CSR should instruct the provider of the "turn back" policy and instruct the provider to "turn back" the trips that are more than 24 hours.
    - Trips that are less than 24 hours will be taken by phone and cancelled.
    - The CSR will get as much information as possible and forward via email, by written memo, or by phone to the Customer Service Center Operation Team, (CSCOT).

B. The –CSCOT staff will forward the information to the Network Management department who will take appropriate steps to ensure that MTM services will not be interrupted. If it is issues relating to phone or fax numbers being incorrect, the CSR will also email the CSCOT staff asking them to send communication via email to the network management email burst.
C. All issues are to be reported to the Quality Management Department for documentation, investigation, and follow up reporting procedures as outlined in QM procedures.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Call Center Operations Date

Corporate Procedure

Subject:	Handling Discharge Request	**Procedure No.:**	200.037
Authorized By:	Director, Call Center Operations	**Date:**	05/09/2001
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
All requests for hospital discharges are screened for eligibility and appropriateness prior to scheduling.

POLICY:
Not Applicable

RESPONSIBILITY:

A. Requests for discharge are accepted from the member or a member's advocate and the information is entered into the Net Management System.
B. When the CSR receives a call for a hospital discharge, member's eligibility is screened.
C. The CSR will enter additional special information that is not reflected in the standard intake screen.
    - Appointment time is the earliest time the member will be ready to be picked up. The transportation provider's estimated time of arrival should be documented in the F4 notes of trip.
    - The CSR will enter the Nurse's Station phone number and the recipients'/members'/beneficiary's room number under the "instructions/special needs" line.
D. The CSR will enter a contact name such as a charge nurse or social worker for the phone number listed above
E. Once identified that the trip request is a discharge, CSR will verify with caller whether the trip is a discharge from an urgent care facility, from the hospital emergency room, or is a discharge from a hospital inpatient stay.
F. CSR will enter appropriate trip reason code so data in reports will provide accurate information.

- Trip reason code 10 = hospital discharge
- Trip reason code 72 = emergency room-FROM
- Trip reason code 61 = transportation from an urgent care

G. If the CSR identifies that the appropriate trip reason code is not an option in the NET Management System, the protocols must be reviewed to ensure the trip request is allowed for the member's health plan.
    - If it is determined that the trip reason is a covered service
    - The CSR will set trip using the next closest trip reason code as an alternate code and note the trip notes. The trip information will be escalated to the leadership staff in order to correct system issue.

H. If it is determined that the trip reason is not a covered service, the trip will be denied using the DF (trip denied-not covered service) trip status code.

I. If the member requires para-lift transportation, indicate on the "instructions/special needs" line if the member has their own wheelchair, or if they need one provided for the trip.
    - The CSR will enter the number of steps at the destination address and the member's approximate weight.

J. The CSR will call the facility to verify the discharge if it is being called in by anyone other than the hospital staff, or a medical professional.

K. Once verified, the CSR will escalate the trip to the Short Notice Transportation Specialist to locate transportation and complete the transportation request. In the event that the trip is during after hours, the CSR will escalate to CSCOT group which is staffed 24/7 365 days a year.

L. MTM will adhere to the specified travel time requirements per client protocols.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Call Center Operations Date

Corporate Procedure

Subject:	Member Eligibility	**Procedure No.:**	200.039
Authorized By:	Director, Call Center Operations	**Date:**	01/02/2013
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
To ensure complete information will be gathered for each trip request, and to ensure that the member is eligible for transportation.

POLICY:
Not Applicable

RESPONSIBILITY:
Member is not in the system

A. The CSR will explain to member that they are showing as not eligible for services but additional verification needs to be completed and it is necessary to transfer the member to the Customer Service Center Operation Team, (CSCOT) team to confirm eligibility using the predetermined process outlined by health plan.
B. The CSCOT representative will obtain the following information from the member and add into the system as either Eligible or Not Eligible based on the information provided on eligibility website/IVR line/member services.
    - Member's Medicaid ID #, Last Name, First Name, Middle Initial, DOB, Gender, Complete Address, Phone #(s).
C. The CSCOT representative will inform the member of the eligibility status.
D. If the member is ELIGIBLE, the CSCOT representative will retrieve all necessary trip information to arrange the request.
E. If the member is NOT ELIGIBLE, the CSCOT representative will politely inform the caller that "you are currently showing as not eligible for transportation services. I am unable to arrange transportation for you at this time."

Eligible and Not Eligible Files

F. ELIGIBLE- An “ELIGIBLE” member is eligible for transportation.
G. You can identify an active member because he/she is NOT marked NOT ELIGIBLE in the system.
H. NOT ELIGIBLE- A “NOT ELIGIBLE” member is ineligible for transportation.
I. Once the file is entered, the Edit Member screen will show that the member is ELIGIBLE OR NOT ELIGIBLE in the “Eligibility status” field.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

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Director, Call Center Operations Date

Corporate Procedure

Subject:	Customer Service Trip Escalation	**Procedure No.:**	201.001
Authorized By:	Director, Call Center Operations	**Date:**	7/12/2011
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
To educate customer service center staff on the escalated call handling procedures.

POLICY:
Policy 201-Call Handling

RESPONSIBILITY:

A. If member is requesting to attend services that require prior authorization, ancillary services, or anything outside of transportation protocols, the CSR will:
    - Enter the appropriate trip related information including referring doctor's information.
    - Document the reason for authorization in the note section of the NET Management System.
    - Assign appropriate trip status code based on type of escalation
        - Prior Authorization
        - Level of Need
        - Meals and Lodging
        - Stretcher/Ambulance
        - Advanced Funds
    - CSR will inform member that once authorization is obtained, they will receive a call back from MTM to finalize transportation request.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Call Center Operations Date

Corporate Procedure

Subject:	Emergency Situations	**Procedure No.:**	201.003
Authorized By:	Director, Call Center Operations	**Date:**	8/15/2001
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
To identify situations that should be referred to an emergency service provider, such as 911 or their local emergency number.

POLICY:
Policy 201-Call Handling

RESPONSIBILITY:
MTM offers non-emergency medical transportation services.

A. If a member or caller requests immediate transportation to a medical facility the CSR will determine the nature of the request by asking questions such as the following:
    1. What situation has prompted this request?
    2. Is the member having trouble breathing?
    3. Has there been an accident?
    4. Is this a woman in labor?
    5. Is the member calling in for reasons of child abuse, elder abuse or suicide threats?
B. Some examples of real emergencies include, but are not limited to the following:
    1. Chest pain or shooting pain down left arm
    2. Loss of consciousness or fainting
    3. Bleeding that cannot be stopped
    4. Drug overdose
    5. Broken bones (EXCEPTION: Minor breaks or fractures, i.e. toes, fingers)
    6. Sudden loss of vision, speech or movements of a body part
    7. Seizures
    8. Injuries from gunshot wounds, knives or accidents
    9. Recent neck or back injuries

10. Labor pains, loss of amniotic fluid or any other serious pregnancy related problems/issues
11. Suicidal threats
12. Physical abuse to a person (child, elder or spouse)

C. If the CSR and/or the member perceive the medical need to be an emergency, the member will be instructed to hang up and immediately call 911 or the local emergency number in their area when applicable.
    1. In the situation where a member calls about suicidal thoughts or abuse, the CSR should keep the member on the phone and immediately flag down a Team Coach or Manager
    2. The Team Coach or Manager should immediately collect the member's information and report to 911

D. If for some reason the caller feels they are unable to make the 911 call for other reasons than specifically noted above, the Team Coach will assist with calling 911 on the member's behalf.

E. All urgent situations will be reported to the Program/Account Manager for appropriate follow up with the designated representative for the Client.

F. MTM does not want to be involved more than necessary in an emergency situation, but must make certain the person understands the instructions and is able to get help.

G. The CSR will document the NET Management System with the appropriate Trip Status Denial Code that will enable the trip to be tracked, reported and trended for quality purposes if needed.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

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Director, Call Center Operations Date

Corporate Procedure

Subject:	Accurate Documentation of NET Management System	**Procedure No.:**	201.004
Authorized By:	Director, Call Center Operations	**Date:**	9/20/2012
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
To ensure all documentation within the NET Management System is accurate, truthful and honest.

POLICY:
Policy 201 Call Handling

RESPONSIBILITY:

A. All MTM staff with access to the NET Management System is required to document accurate, truthful and honest information when entering any kind of information into a member's trip.
B. Incidents of information falsification will be handled on a case-by-case basis and will be investigated by Call Center leadership staff to determine if the incident happened due to error, misunderstanding or was intentionally conducted.
C. Intentional falsification of any kind within the NET Management System may result in discipline up to and including termination from employment.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____
Director, Call Center Operations Date

Corporate Procedure

Subject:	Transportation Provider Trip Turn-Backs	**Procedure No:**	201.005
Authorized By:	Director, Call Center Operations	**Date:**	10/10/2013
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
To ensure any/all transportation assignments canceled by a transportation provider (trip turn-back) are reassigned to another transportation provider in a timely fashion so the member is able to attend their scheduled appointment.

POLICY:
Policy 201 – Call Handling

RESPONSIBILITY:
Trip turn-backs are handled by the Customer Service Center staff.
Staff will take the following actions:

A. Monitor appropriate MTM systems (e-mail, fax, phone, etc.) for trip turn-backs.
B. Ensure the trip turn-back is canceled within the NET Management System and the transportation provider turning the trip back receives a cancelation from MTM.
C. Reassign the turned-back trip to a new transportation provider.
D. Contact the member or the member's representative to inform them there has been a need for a change in their scheduled transportation provider and providing them with the name and contact information for the new transportation provider.
E. Enter all details in the trip notes section of the canceled trip as to why the trip was turned-back, if known.
F. Enter all details in the trip notes section of the new trip on the staff members activity while resetting the new trip (i.e., which transportation providers were contacted attempting to re-set the new trip, who declined or accepted the new trip if it was a short-notice trip, etc.).

G. Use the appropriate trip canceling and setting codes within the NET Management System to ensure proper tracking/trending can be conducted.

Note: If the trip turn-back is received within 48 hours of the actual time of appointment, all prospective replacement transportation providers must be called to verbally verify they can accept the short-notice trip.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Call Center Operations Date

Corporate Procedure

Subject:	Consumer (Member) Satisfaction Surveys	**Procedure No.:**	202.001
Authorized By:	Director, Call Center Operations	**Date:**	11/12/2012
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
To obtain customer satisfaction information from members calling MTM to utilize the transportation benefit.

POLICY:
Policy 202 Customer Service Center Telephone Conduct

RESPONSIBILITY:

A. Member satisfaction surveys are conducted on a continual basis by a third party provider.
B. Surveys are conducted a maximum of once every thirty (30) days per member.
C. Surveys are conducted from a statistically valid sample based on member utilization.
D. Survey results are compiled and presented to MTM Clients on a monthly basis.
E. Survey results are evaluated to identify additional training needs with MTM call center staff.
F. Survey results are reported to the Quality Management Committee (QMC) on a quarterly basis.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Call Center Operations Date

Corporate Procedure

Subject:	Power Outage System Failure	**Procedure No.:**	204.001
Authorized By:	Director, Call Center Operations	**Date:**	1/1/2012
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
To be prepared and have a plan in place for times of power outages and/or system failures.

POLICY:
Policy 204 - Customer Service Center Service Disruption

RESPONSIBILITY:

A. Customer Service Representative's (CSRs) are always equipped with a manual call intake trip sheet and the Customer Service Center (CSC) staff is standing by to provide extra sheets to those who are in need of them.
B. The only trips that will be set during an outage are hospital discharges, urgent care trips, or trips to the ER (provided that it is covered per the protocols for the HP the member has). For all other trip inquiries, request the caller to call back at a later time.
C. The CSR will advise the callers that all trips are being handwritten due to system maintenance therefore the process will take slightly longer than usual.
D. Every space of the trip request form must be filled out including the member's information. The CSC will need to check websites to confirm eligibility for each health plan when applicable. For the sites that you do not have access seek assistance from a Coach.
E. Unless the caller knows which transportation provider was assigned to their trip, the transportation provider will not be able to be reached. The CSR may utilize the county by county lists to reach vendors to take discharges. This may require the caller to advise what county they are calling from.

F. If a CSR is concerned about a specific trip they are working on not being faxed to the vendor during the outage, they may send the trip number to their Coach and the Coach will ensure the trip has been faxed once the system is up and running again. With the system going down, if a fax is being transmitted at that time, it will be cut off during the transmission and will not go through until the system comes back up.
G. When setting a trip with a transportation provider, advise them that the system is down and they will receive the fax once the system is back up. The CSR must have detailed notes on the manual trip intake document; therefore third shift can accurately enter in the trips. If the transportation provider requires a fax before they go to pick up the member; advise them that the manual trip intake document can be faxed to them, however they will not receive a trip number at this time. Once the system is up and running they will receive the normal trip fax.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Call Center Operations Date

Corporate Procedure

Subject:	Inclement Weather-Missed Appointments	**Procedure No.:**	206.001
Authorized By:	Director, Call Center Operations	**Date:**	2/1/2012
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
To define a purpose for Customer Service Representatives (CSR) to handle calls from members regarding missed appointments, late arrivals and cancellations as a result of inclement weather.

POLICY:
Policy 206 Inclement Weather

RESPONSIBILITY:
A member of the management team will communicate to the CSRs any specific area that is experiencing inclement weather and inform the CSRs to follow the Inclement Weather Policy. The CSRs will follow the steps below to help resolve transportation issues during these times:

- Always inform the member we understand the inconvenience this may have caused them and we will do what we can to accommodate their request
- Offer assurance of help
- Show empathy through your tone of voice

CSRs will need to sympathize to the member they understand the inconvenience as well as advise the member due to the inclement weather, transportation services have been affected.

CSRs will contact the transportation provider to see if they can obtain an ETA.

- If the transportation provider is not going to get the member to his/her appointment on time, the CSR will direct the caller to contact the facility to see if they are able to be seen late and if so, up to how late.
    - If the facility states the member can be seen late, the CSR will notify the current transportation provider to continue with transportation service needs

CSRs will offer to do whatever they can in order to accommodate the member's transportation request. The CSR may offer to contact another transportation provider in the event the original transportation provider is not able to accommodate the request.

- If the member was arranged with public transportation and bus passes have already been sent, the member should be informed to return the passes.

In the event there is not a transportation provider available to accommodate the trip due to the inclement weather, the CSR will follow the below steps:

- Inform the member we understand the inconvenience it has caused them and offer to assist them with rescheduling their transportation for another day after they have scheduled a new/replacement appointment.
- If necessary and if the member has been charged a no-show fee by their facility for not arriving on the day of the inclement weather, offer to call the facility in order to assist the member getting any no show fees waived.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Call Center Operations Date

6.0 Care Management

Overview

MTM is dedicated to increasing healthcare access by providing quality transportation services to the medically needy. Out of this knowledge came the formation of MTM's Care Management Department. The Care Management Department offers high touch management for recurring trips and members that are frequent utilizers of transportation. The Care Management also focuses on members with the most costly trip requests. MTM's Care Management Department will collaborate as needed with medical facilities and case managers. The Care Management Department provides extra attention to those situations that require intense review, including special care beyond a standard trip request or interaction with healthcare professionals.

MTM was the first in the industry to utilize a care management approach that provides a person-centric focus and enhanced coordination of services. MTM's Care Management departmental goal is to implement responsible solutions and reduce wasteful spending by providing extra attention to those situations that require more intense review, special care beyond a standard request, and interaction with healthcare professionals

The Care Management Department also plays a vital role in MTM's efforts to prevent intentional and unintentional instances of fraud and abuse. Processes and audits built into the workflow of the department enable staff to readily identify patterns, tactics, and indicators of fraud and abuse, as well as prevent the misuse of benefits through improper scheduling or mode assignment.

MTM's Care Management Coordinators work to appropriately address "special" transportation needs by:

- Working with healthcare personnel including physicians, nurses, case managers, and social workers to coordinate and verify recurring trips for treatments such as dialysis, day treatment, mental health, and children's programs, while keeping in mind each member's special needs and the ways of controlling transportation costs.
- Coordinating all transportation requests requiring stretcher to ensure trip criteria mirrors federal guidelines.
- Arranging ancillary services such as meals and lodging.
- Collaborating with On the Move travel training staff for the on-site functional assessment process.

Care Management Outreach

MTM works directly with the local community to provide outreach and education to medical facilities and advocacy groups regarding the NEMT program. Proper education is often the key to increasing satisfaction and reducing complaints. MTM will meet with local stakeholders before start-up and then as needed or requested to ensure service satisfaction among these groups. Care Management staff also works closely with transportation providers and medical facilities, particularly those where recurring trips are the norm, to group members and trips whenever possible to pursue cost savings while fulfilling the transportation need. Care Management staff work closely with public transit companies in an effort to develop new routes or shuttle services in areas where lacking so members may access less costly public transportation if possible.

For medical provider convenience, the Care Management Department has direct telephone, fax, and e-mail access.

Member Outreach

Throughout the life of this contract, our Marketing Department will develop and print brochures, informational packets, instructional materials, and other written items for dissemination to NEMT members, long-term care facilities, local human service agencies, NEMT Providers and Medical Providers in the State. The education plan shall emphasize the availability of NEMT Services, eligibility for these services, standing orders, medical documentation of need and how to request and use NEMT Services. All materials will be culturally sensitive and we will ensure all member educational materials are easy-to-read and at a sixth-grade level as verified by the Flesch-Kincaid ease of readability index.

Prior to distribution, we will submit all written material to DHCFP for review before mailing. MTM will also send notices to affected parties of any rules and/or regulation changes as soon as possible and within 30 days of the effective date. Member notices include:

- A detailed explanation of available benefits, including amount, duration, and scope.
- How to arrange transportation, including the number to call.
- What is required to obtain approval, days' notice, and an explanation of urgency.
- The hours of operation.
- The toll-free number for our Where's My Ride Line.

User-Friendly Stakeholder Website

Nevada-area NEMT stakeholders can access a user-friendly website that will include initial and ongoing notices to Members and Providers regarding the availability of transportation assistance and instructions on how to access it, including a prominent notice that such assistance is available free of charge. The site address is http://www.mtm-inc.net/Nevada/ and includes:

- Member Education
- Responsibilities and Conduct
- Glossary of Terms
- Resources for members
- Mileage Reimbursement Trip Log
- Important Links
- Transportation Request Form
- Level of Need Form
- Parental Consent Form- English

The website also features a Frequently Asked Questions (FAQ) page for quick reference and a glossary to facilitate effective communication. The site feeds from our corporate website, www.mtm-inc.net.

Care Management Procedures

Policy 1033	Ancillary Services
Policy 1351	Medical Facility Satisfaction Survey
Policy 1368	Long Distance Transportation Requests
Policy 1369	Recurring Appointment Transportation
Policy 1384	Level of Need Assessments
Procedure 206.002	Inclement Weather at Care Managed Facilities

Corporate Policy

Subject:	Ancillary Services	**Policy No.:**	1033
Authorized By:	President/CEO	**Date:**	6/22/2001
Department:	Care Management	**Last Revised:**	5/1/2014
Applicability:	Care Management		

PURPOSE:
To approve, schedule, and reimburse members for ancillary services such as meals, lodging, tolls, and/or parking for members, attendants, and escorts, to include transport via commercial air, commercial bus and commercial train.

POLICY:
Requests for ancillary services for members, attendants, and escorts are screened for eligibility and appropriateness, scheduled, and reconciled.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:
1. Requests are received via phone, fax or email.
2. Eligibility is checked.
    a. Eligibility is confirmed.
    b. Coverage of ancillary services is confirmed.
    c. Coverage of medical service type is confirmed. MTM will verify the medical necessity related to out-of-state-travel, overnight stays, and meals and lodging by contacting the client's Utilization Management, Member Services or Care Management Department as identified per specific contract and protocol.
    d. Appropriateness of trip distance is confirmed.

    e. Necessity/coverage of any attendant or escort is confirmed.
3. If it is determined that member does not meet any of the eligibility or appropriateness requirements, request is denied.
4. If it is determined that member meets all eligibility and appropriateness requirements, request is approved.
5. As identified per specific contract or protocol, the prior authorization process will be followed and as indicated any Prior Authorization Form will be used for authorization or denial to communicate between client and MTM.
6. Trip is entered into NET Management System.
    a. Approved services and maximum amounts are documented.
7. Method of reimbursement given is identified within specific contract and may include:
    a. The facility member is visiting covers all costs for meals and lodging incurred by member. After the stay, facility bills MTM for those charges.
    b. Member retains receipts for meals and lodging incurred during their stay. Receipts are mailed or faxed to MTM, who then issues a check directly to member or other person specified by member.
    c. MTM will pay contract specified amount per day for meals and contract specified amount per day for lodging.
    d. Member may receive pre-payment directly from their health plan and there is no billing through MTM.
    e. In cases where no other forms of payment are available, the services are paid for in advance by MTM.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Operations Oversight & Review	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Medical Facility Satisfaction Survey	**Policy No.:**	1351
Authorized By:	President/CEO	**Date:**	4/28/2003
Department:	Care Management	**Last Revised:**	5/1/2014
Applicability:	Care Management		

PURPOSE:
To obtain feedback from medical facility representatives on the quality of service provided by MTM's transportation providers and MTM Care Management Coordinators (CMC).

POLICY:
The Care Management Department (CM) will work with an outside company to distribute an annual survey to facilities and measure their satisfaction with MTM services.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:

A. MTM contracts with an outside company to survey facilities that CM services.
B. At a minimum of once a year, surveys will be provided to medical facilities that have a working relationship with CM. The surveys will help to determine satisfaction with transportation services and their specific CMC.
C. The survey, including a cover letter explaining the purpose of the survey, is provided to medical facilities.
D. Medical facility responses are returned to designated outside company.
E. Survey results are tabulated, tracked, and analyzed by designated outside company.
F. CM and Quality Management will receive copies of the tabulation of results.

G. All feedback is shared with the appropriate CMCs.
H. Any respondent who reports problems or negative responses is identified and contacted by the appropriate CMC to discuss solutions.
I. Information is trended based on survey results; strengths are reinforced and quality improvement measures are developed and implemented based on survey results.
J. The results of the analysis, tracking and trending are reported to the Quality Management Committee (QMC).
K. An in-service training program and/or information packet is developed or updated based on the survey response and used for client education and customer service.
L. In-service training sessions are scheduled as needed, and at the convenience of the facility.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Operations Oversight & Review	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Long Distance Transportation Requests	**Policy No.:**	1368
Authorized By:	President/CEO	**Date:**	5/31/2001
Department:	Care Management	**Last Revised:**	5/1/2014
Applicability:	Care Management		

PURPOSE:
To approve, coordinate, and schedule long distance transportation requests and when appropriate, ancillary services.

POLICY:
Long distance transportation requests are screened for eligibility and appropriateness, authorized, arranged, and scheduled.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:
1. Requests are received via phone, fax, or email.
2. Member eligibility is verified.
    a. Coverage of service type is confirmed.
    b. Compliance with distance guidelines established by specific client is confirmed.
3. Trip is set in NET Management System.
4. Most appropriate, cost-effective mode of transport is determined. Non-traditional means such as train or plane are considered.
5. Upon request by member and when allowed by member's health plan, ancillary services such as meals and lodging are arranged (see Policy 1033).

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Operations Oversight & Review	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Recurring Appointment Transportation	**Policy No.:**	1369
Authorized By:	President/CEO	**Date:**	4/25/2005
Department:	Care Management	**Last Revised:**	5/1/2014
Applicability:	Care Management		

PURPOSE:
To approve and schedule transportation to recurring appointments for eligible members.

POLICY:
Requests for recurring appointment transportation are screened for eligibility, appropriateness, and trips are scheduled.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:

1. Care Management Coordinator (CMC) receives requests for recurring appointment transportation from medical facility representatives via phone, fax, or email.
    a. Request is screened for eligibility.
    b. Request is screened for appropriateness of service type.
    c. Request is screened for appropriate transportation requirements. Special needs are discussed at this time.
    d. Duration of treatment is determined and recurrence schedule is created in NET Management System.
    e. Transportation is scheduled with most appropriate, cost-effective transportation provider who can accommodate any special needs for member.

f. Caller is notified of the transportation provider responsible for transports and appropriate contact numbers for that transportation provider.
g. Caller is asked to contact MTM with any changes to the transportation schedule including extending or cancelling the appointments.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Operations Oversight & Review	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Level of Need Assessments	**Policy No.:**	1384
Authorized By:	President/CEO	**Date:**	11/17/2009
Department:	Care Management	**Last Revised:**	5/1/2014
Applicability:	Care Management		

PURPOSE:
To ensure that the most appropriate and cost effective mode of transportation is utilized based on a member's cognitive and/or physical needs.

POLICY:
A Level of Need (LON) assessment form will be reviewed in Care Management (CM) to determine the most appropriate mode of transportation for members based on their cognitive and physical condition.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:
1. Transportation request is received via phone, fax, or email and level of service that member is certified for is offered.
    a. If level of service is accepted, trip is set.
    b. If level of service is NOT accepted, proceed to step 2.
2. Member's healthcare provider's information is obtained and documented in NET Management System.
3. Level of Need (LON) assessment form is faxed to healthcare provider to verify the most appropriate mode of transportation.
4. A temporary certification at desired mode of transportation is provided, while waiting on return of LON.

5. If LON has not been returned in three (3) business days, CM will make a follow up call to healthcare provider's office to verify fax number used was correct and/or receipt of LON and ask that LON be completed and returned so transportation can be finalized for member.
6. If LON is not received before temporary certification expires, member's mode will revert back to original mode of transportation.
7. Upon receipt of completed LON, it is reviewed by CM.
8. Cognitive and physical diagnosis information from LON will be documented in NET Management System.
9. CM will evaluate LON data and determine appropriate level of service and length of certification.
    a. If additional data is needed to make determination, CM may contact healthcare provider listed on LON.
    b. When appropriate and allowed by client, LONs are forwarded to the *On the Move!* Travel Training team for further assessment.
10. Approved level of service and length of certification are documented in the notes section of member's certification screen.
11. Certification screen is updated to show member's approved certification level.
12. Member's future trips are scheduled at approved level of service.
13. Member is notified of their authorized mode of transportation and transportation provider's contact information.
14. CM files all LONs electronically for future reference.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Operations Oversight & Review	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Procedure

Subject:	Inclement Weather at Care Managed Facilities	**Procedure No.:**	206.002CM
Authorized By:	Manager, Care Management	**Date:**	4/28/2003
Department:	Care Management	**Last Revised:**	5/1/2014
Applicability:	Care Management		

PURPOSE:
To reschedule recurring trips for care managed facilities, when a transportation provider turns back trips due to inclement weather.

POLICY:
Policy 206 – Inclement Weather

RESPONSIBILITY:
Recurring trips for care managed facilities (dialysis and/or children's day treatment programs) turned back by a transportation provider for inclement weather are documented, cancelled, and changed or rescheduled.

1. Transportation provider notifies MTM of cancellations.
2. Network Management (NM) notifies Care Management (CM) of transportation provider cancellations.
3. Only those trips affected by the inclement weather are cancelled.
4. Care Management Coordinator (CMC) will then:
    a. Call medical facility to confirm they are still open in spite of inclement weather.
    b. If medical facility is closed, call member and inform them their appointment is cancelled due to inclement weather.
    c. If medical facility is not closed, call to find an appropriate transportation provider who will transport the member.
        i. If a transportation provider is found, cancelled trip will be copied and rescheduled with new transportation provider.
    d. If new transportation provider cannot be found, CMC will contact member and ask them to reschedule their appointment.

e. If necessary, CMC will make appropriate changes to Recurring Trip Program (RTP).
f. CMC will call medical facilities as needed to inform them of new transportation providers and appropriate contact numbers.
g. CMC will document NET Management System trip notes:
    i. Why trip was cancelled
    ii. Who was spoken to at transportation provider's office
    iii. Who was notified at medical facility and that member was notified

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Operations Oversight & Review Date

7.0 Marketing Communication

Overview of Marketing Communication

MTM's Marketing Department ensures effective communication among stakeholder populations by developing member educational materials, website content, newsletters, and community outreach materials. This includes ensuring all documents are culturally sensitive, are easy-to-read as verified by the Flesch-Kincaid ease of readability index, and meet the needs of all populations, including those with visual impairments and foreign language needs. The Marketing Department provides consistent communication to notify stakeholders of program changes and updates to service parameters.

Marketing Communication Policies and Procedures

Policy 901	Marketing Communication
Policy 902	Media Relations
Procedure 901.001	Health Literacy
Procedure 901.002	Website Verification and Maintenance
Procedure 901.003	Review of Marketing and Sales Materials

Corporate Policy

Subject:	Marketing Communication	**Policy No.:**	901
Authorized By:	President/CEO	**Date:**	12/11/2009
Department:	Marketing	**Last Revised:**	5/1/2014
Applicability:	Marketing		

PURPOSE:
To provide corporate consistency and protect MTM's image in all printed materials. Materials include proposals, presentations, manuals, marketing materials, presentation, forms, letters, reports, websites, etc. and anything that is shared outside of MTM employees.

POLICY:
Defines marketing mechanisms that ensure inter-department accuracy and consistency.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:

1. Visual Standards for all Materials
    a. All logos, colors, photographs, and fonts must be used in accordance with the MTM Corporate Guidelines.
    b. All communications must have a company logo in the header or footer.
2. Internal Printed Communication Materials
    a. Internal printed materials include employee manuals, newsletters, websites, intranet materials, corporate brochures, press releases, case studies, etc. (Items that do not require client approval)
    b. Each department should create the required document and get their department's approval prior to sending to marketing.

   c. All materials must be prior approved by MTM's Corporate Marketing department prior to release of information to the public.
   d. All materials must be reviewed at a minimum on an annual basis.
   e. Approvals at a minimum will include the department head and Marketing; all other approvals will be as deemed necessary.
3. External Printed Communication Materials
   a. External printed materials include State specific websites, recipient/member brochures, client manuals or handbooks (requiring approval), client protocols, specific press releases and/or case studies (requiring approval).
   b. Marketing will create the specific websites, recipient/member brochures, press releases, and case studies with the assistance of the Program Manager.
   c. All manuals will be created by the appropriate department with Marketing's assistance and final approval.
   d. All materials created for a specific client must be approved by the client prior to the release of any documents to the public, when required.
4. Review of Communication Materials
   a. All external printed materials will be numbered by the marketing department in the following manner.
      i. V1.0 draft
      ii. V2.0 internal review
      iii. V3.0 external review
      iv. V4.0 edited version
      v. V5.0 final
   b. All internal and external documents will be reviewed annually with the exception of educational materials only provided during the implementation period of the new contract and Ads which would also be a one-time use document.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
VP, Marketing	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Media Relations	**Policy No.:**	902
Authorized By:	President/CEO	**Date:**	11/24/2009
Department:	Marketing	**Last Revised:**	5/1/2014
Applicability:	Marketing		

PURPOSE:
To establish protocols to ensure consistent and appropriate messaging in media relations and interaction.

POLICY:
All inquiries from media personnel will be handled in accordance with an established "chain of command." All issues of high visibility must be reported to the Vice President of Marketing.

RESPONSIBILITY:

A. When a call from the media or in-person inquiry by the media occurs, the person receiving the inquiry must immediately contact the Vice President of Marketing to handle the situation.
    - Only staff trained in media relations and properly authorized by MTM should respond to questions from the media.
B. The media inquiry will then be referred to a Marketing Writer with media training or a corporate Executive.
C. Media inquiries will be responded to using proper media interview guidelines which are part of the on-going media training and given to all executive and senior management.
D. Media inquiries must be received in writing or via email unless a prearranged, taped interview is taking place. Likewise, all responses to media inquiries must be in writing or via email.
E. A written response will be developed and circulated through the appropriate Executive team members and the client if contractually required or requested.
F. Following approval of the written response, the Marketing Writer will submit the response to the media outlet and facilitate any additional clarification.

G. All MTM employees are responsible for reporting to the Vice President of Marketing any high visibility issue such as accidents involving serious injuries, significant or unusual complaints that may have potential for involving the media, etc.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
VP, Marketing	Date
_____	_____
President/CEO	Date

Corporate Procedure

Subject:	Health Literacy	**Procedure No.:**	901.001
Authorized By:	VP, Marketing	**Date:**	9/1/2012
Department:	Marketing	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
To establish a procedure to ensure all materials disseminated from MTM are communicated in a clear and concise manner and in conjunction with Client specifications. MTM's goal is to provide members with material that will enable them to understand basic transportation information as related to their health benefits and allow them to make both well informed and appropriate decisions.

POLICY:
Policy 901 - Marketing Communication

RESPONSIBILITY:
MTM will utilize plain language defined as communication that uses short words and sentences and common terms as opposed to jargon; and focuses on the essential information that members need to understand.
MTM will accomplish this goal by adhering to the following:

- All member correspondence must be approved through the Client and the Marketing Department by utilizing the Marketing Tracking Spreadsheet
- MTM will ensure all consumer materials meet client specifications per stipulated contract language.
- Employees writing consumer material may visit www.plainlanguage.gov for information and helpful tips
- The Marketing Department will utilize the Fleishman-Kincaid program to check that all documents are adhering to the aforementioned standards

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

VP, Marketing Date

Corporate Procedure

Subject:	Website Verification and Maintenance	**Procedure No.:**	901.002
Authorized By:	VP, Marketing	**Date:**	11/1/2012
Department:	Marketing	**Last Revised:**	5/1/2014
Applicability:	Marketing		

PURPOSE:
To ensure the MTM website is up and running and accessible to MTM's Clients and their membership so they may communicate with MTM via the website.

POLICY:
Policy 901 - Marketing Communication

RESPONSIBILITY:

A. A designated staff member within the Marketing Department will ensure the MTM website is up and running correctly twice a month, on the 7th and 22nd of each month (or the next business day if the established day falls on a weekend/holiday).
B. A designated staff member within the Marketing Department will also ensure the screen where MTM's Client's members can communicate with MTM is working properly and is user friendly for people.
C. Any discovered problems which could last more than twenty-four (24) hours will be reported to Client Services so they may make any necessary notifications to Clients.
D. An activity log will be maintained with the Marketing Department to ensure this procedure is being followed and will be available if requested.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____
VP, Marketing Date

Corporate Procedure

Subject:	Review of Marketing and Sales Material	**Procedure No.:**	901.003
Authorized By:	VP, Marketing	**Date:**	11/01/2012
Department:	Marketing	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
To ensure all marketing materials, sales materials and other documents related to MTM business which may or may not become public, are accurate and represent MTM correctly.

POLICY:
Policy 901 - Marketing Communication

RESPONSIBILITY:

A. Marketing materials, sales materials, along with other MTM business related documents are approved through Marketing prior to becoming public information.
B. Marketing staff is continually fine-tuning these materials for correctness and accuracy as they are sent out multiple times annually when MTM is bidding on business.
C. All materials are reviewed a minimum of annually.
D. Marketing is responsible for ensuring accuracy with these materials; if a problem is discovered, it is Marketing's responsibility to correct the problem as soon as possible and notify any necessary parties to the problem and the correction.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____
VP, Marketing Date

8.0 Quality Management

Overview

The Quality Management Department includes several components that monitor and improve MTM service delivery. MTM strives to provide individualized focus for every relevant area of quality improvement and management. This department documents, investigates, and resolves complaints and risk issues, manages fraud and abuse, and performs audits including those pertaining to transportation providers and call intake. MTM follows the Utilization Review Accreditation Committee (URAC) for monitoring of all facets of our operations.

Quality Management Program

MTM's Quality Management Program monitors reported issues for evaluation and detects any trending key areas. Quality improvement activities focus on customer satisfaction, procedure improvement, and continuous monitoring of services provided by MTM and its contracted transportation providers. Quality indicators are continuously monitored for compliance to performance standards. Trends that fall outside of MTM's expected performance threshold are evaluated, and Performance Improvement Plans (PIPs) are implemented when necessary. Quality Management also develops new initiatives, policies, and procedures to improve the outcome of the service(s). Accessibility, safety of transportation services, and customer satisfaction are the expected outcomes of Quality Management's efforts.

Supporting the program is MTM's Quality Management Committee (QMC). The QMC is the team of executives and senior managers tasked with evaluating service trends, developing PIPs, recommending policy changes, creating policies and procedures, and recommending sanctions.

Complaints and Appeals Processes

To ensure all stakeholders have a path of recourse, MTM has an equitable, fair process for complaints and appeals. MTM will meet all requirements of the complaint and appeals process, including State Fair Hearings. DHCFP stakeholders have a Quality Service Coordinator dedicated solely to this contract. This individual handles all complaints, monitors for any trends, and builds relationships with program stakeholders. All NEMT stakeholders may file formal complaints verbally or in writing about any covered service received under this program. MTM maintains accurate records of complaints and understands DHCFP may publicly disclose a summary of the complaint and disposition.

MTM offers reasonable assistance to stakeholders to file a complaint or reconsideration. These stakeholders include:

- Members
- Transportation providers
- Advocates
- Medical providers
- Social workers
- Case managers
- Community agencies
- DHCFP

We will provide the complaint, appeal, and State Fair Hearing process and dispositions verbally and in written form. MTM's policies identify the individuals with oversight of the State Fair Hearing process; these individuals have the authority to require corrective action. Please see a list of Quality Management policies and procedures at the end of this section.

Member Complaint, Reconsideration, and State Fair Hearing Processes

MTM trains and monitors transportation providers and our staff on acceptable conduct. In the event that a member perceives the service they received does not meet their expectation, members can utilize an equitable complaints, reconsideration, and State Fair Hearing process.

Transportation Provider Complaints and Appeals

MTM has an equitable complaints and reconsideration process for transportation providers for all claims-related issues.

Member Complaint and Reconsideration Process

If a member or their medical provider wishes to express dissatisfaction with the service they receive from MTM or a transportation provider, he/she may express their concern verbally through the We Care Line, through the online complaint web page, or in writing by mailing their complaint to MTM. MTM's complaints process encompasses receipt, research, communication, and education to achieve satisfactory resolution. The QMC reviews these processes annually to ensure that MTM remains current with emerging trends and/or changes in Medicaid.

In the event that a member is not satisfied with the results of the complaint resolution, s/he will have the opportunity to express their concern as an escalated complaint to MTM in writing by mail, or verbally by calling the We Care Line to request escalation.

Transportation Provider Complaints and Appeals

MTM has established procedures for the transportation provider complaint and appeal process that guarantee the right for a review of any action taken by MTM. Transportation providers will be trained on the procedures of complaint and appeals process.

Transportation Provider Inquiries

Transportation providers have access to a dedicated Network Management team. This team is dedicated to the Nevada service area and to the local transportation providers to ensure program satisfaction. A Field Inspector meets with the transportation provider at least annually but is also available for on-site meetings as requested. The transportation provider can also access MTM's toll-free Transportation Provider Helpdesk to make an inquiry.

Transportation Provider Complaints

Transportation providers may file a complaint within one year of the incident. Once resolution has been completed, the complainant is made aware of the resolution and their ongoing appeal rights if they deem the resolution unsatisfactory.

Transportation Provider Appeals

In the event that a transportation provider is not satisfied with the results of the complaint resolution, the transportation provider will have the opportunity to express their concern as an appeal. An appeal can be a written request for further review of a complaint for which the complainant remains unsatisfied after completion of the complaint process. The transportation provider must submit their appeal within 15 days of the complaint resolution. MTM will acknowledge the receipt of the appeal in writing within 10 business days of receiving the appeal.

MTM will make every attempt to resolve the issue to the satisfaction of the provider within 30 days of filing.

Record Keeping and Reporting

DHCFP will receive monthly summary reports of complaints, appeals, and State Fair Hearings. This monthly report will include the number of complaints received, how complaints were received (by phone, written communication, or through approved electronic transmission), dates received, date of resolution, and a description of the resolution.

MTM documents and tracks complaints in the NET Management System in accordance with DHCFP requirements. The system records all information pertaining to complaints including member name, date(s), and any corrective action required. It also records all supporting trip information including detailed notes entered by CSRs.

Fraud, Waste, and Abuse Provisions

MTM is fully dedicated to reducing fraud, waste, and abuse of the NEMT benefit. We take all accusations and suspicions of fraud, waste, and abuse seriously, and conduct thorough investigations of each occurrence. By reducing fraud and abuse of the system, MTM can effectively lower overall transportation costs for DHCFP. Our automated systems and 100% trip reconciliation process help us proactively identify suspected cases of fraud. One of the main ways we reduce fraud, waste, and abuse of NET is through comprehensive, informative training.

MTM trains our CSRs and other staff to report suspicious behavior and information to our fraud review team, which then investigates the issue thoroughly. Should MTM suspect that a member has misrepresented a medical condition to justify the need for NEMT services, the trip is flagged and a fraud alert initiated. A member of the Compliance Team conducts an investigation by calling the medical provider to verify the medical necessity for NEMT. If, through the findings of the investigation, MTM determines that the medical condition was actually falsified, all subsequent trips will require authorization and verification by the medical provider.

MTM also trains our network of transportation providers on MTM's fraud, waste, and abuse prevention policies. They are informed that fraud, waste, and abuse will not be tolerated under any circumstance and that their activities will be monitored on an ongoing basis. Transportation providers are given guidelines on trip and billing requirements to help us reduce the likelihood of transportation providers committing fraud or submitting errors with trip and billing documentation.

Any case of suspected fraud on the part of a member, transportation provider, or medical provider will immediately be brought to the attention of DHCFP. Outside of the aforementioned training; MTM has established several prevention and identification methodologies to combat member, transportation provider, and even medical facility fraud. These methodologies include, but are not limited to, attendance verification and frequent flyer/high cost user reports.

Fraud and Abuse Detection and Prevention Supported by MTM's System

Since MTM custom built our NEMT Management System for administering transportation programs, we designed it to identify potential fraud early and raise a fraud alert. The system confirms the member's eligibility and then only allows scheduling to covered services and with approved modes. The system also has an automated reconciliation process that matches the electronic claims files sent by the provider with trips scheduled within the system. This generates exception reports for review by the Claims Auditor. In the event that MTM identifies a member as demonstrating suspicious activity, the member is placed on our fraud watch list. The next time s/he calls to schedule a trip, the system will alert the CSR to verify that a scheduled appointment exists prior to arranging transportation, and to review other member information for potential fraud.

Identifying Frequent Flyers and High Cost Users

As a portion of fraud, waste, and abuse often comes from frequent flyers and high cost users of NEMT services, our system will develop a weekly frequent flyer report. A DHCFP-dedicated Care Management Coordinator will work with the Program Director to review this report to identify members with a frequent trip pattern to verify trip completion and eligibility, and to determine whether the trip was to a covered service. The Care Management Coordinator will perform the same review to identify members who have a pattern of taking multiple high cost trips to ensure the service was actually performed. In addition, our Quality Management Department will watch for trends of fraud alerts and missed appointments as early identifiers of potential abusers.

Protecting Against Fraud and Abuse

To ensure payment only for services rendered, we will conduct signature review for 100% of trips during reconciliation. As a measure to protect against fraud, waste, and abuse, we require signatures from the member for all completed one-way trips. By reconciling 100% of completed trips and performing validation checks on five percent of all NEMT services requests per month,

MTM can quickly catch instances of potential fraud and abuse. MTM will report validation checks findings to DHCFP on a quarterly basis.

Preventing Fraud and Abuse of Transportation Provider Billing

MTM's NEMT Management System calculates trip mileage for each trip during scheduling to ensure that MTM pays the appropriate amount per trip. The system also prevents the occurrence of double billing, billing for a round trip instead of one-way, billing for non-covered services, and billing for individuals who are not covered members. Our system can also check transportation requests against filed medical claims to ensure that a medical claim was filed for the same day transportation resources were utilized.

Quality Management Procedures

Policy 401	Complaints Management
Policy 408	Reporting and Handling of Accidents-Incidents
Policy 410	Management of Grievances and Appeals
Policy 416	Policy Approval
Policy 429	Denial Letters
Policy 440	Performance Improvement Plan – Transportation Providers
Policy 443	Fraud, Waste and Abuse Prevention and Investigation
Policy 468	Quality Performance – Call Monitoring Process and Evaluation
Procedure 202.001	Consumer (Member) Satisfaction Surveys

Corporate Policy

Subject:	Complaints Management	**Policy No.:**	401
Authorized By:	President/CEO	**Date:**	4/10/2001
Department:	Quality Management	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
To establish a mechanism and reporting system for all complaints including documentation, evaluation, tracking and trending, resolution and performance improvements in order to improve quality of services.

POLICY:
All complaints are important and are channeled to the Quality Management Department (QM) (unless protocols state otherwise) for documentation, investigation, tracking and trending, resolution, follow up and reporting.

Definitions:
Client: Refers to the customer contracted with MTM to handle the covered benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, Clients, members and other terms, for MTM purposes, member is being used as a standard meaning for the Client's covered population.

Complaint: Any written or verbal expression of dissatisfaction about services, procedures or functions of MTM which causes an intervention by MTM for the member and/or the caller (if different).

Serious Complaint: Involves complaints such as, but not limited to those of sexual harassment, discrimination, threatening conversation/behavior or safe driving issues, etc.

Unsubstantiated Complaint:
An internal or external complaint in which, after full investigation is completed, the reported issue was found to be in compliance with MTM's Transportation Provider Handbook or internal policies and procedures.

Warm Transfer: A process where MTM is not delegated by the Client to handle complaints or for a specific process where the member needs additional assistance. In a Warm Transfer, the member will be transferred as directed by the Client to a location (phone number) other than MTM. MTM staff will remain on the line until a live person is reached.

RESPONSIBILITY:

A. A toll free number is available for Clients, members and healthcare providers to call and file a complaint.
B. All MTM personnel are trained to forward all calls (according to Client contract) regarding complaints to QM where an assigned Quality Service Representative (QSR) will intake and document the issues.
C. An assigned Quality Service Coordinator (QSC) will conduct the investigation, follow up, and reporting for all complaint issues, per contract.
D. If the complaint call is received after normal business hours or during holidays, the caller will receive the option to leave a voice message. A QSR will return the call by the following business day to ensure the complaint is documented and addressed.
E. The assigned QSC will then begin the investigation, resolution, and follow-up process. QSCs work with pertinent stakeholders to resolve complaints and initiate performance improvement plans. The QSC will document and code all complaints in the Non-Emergency Transportation (NET) Management System.
F. Complaints submitted via mail, fax and/or e-mail will also be addressed in the same manner. The QSC will contact the person the complaint within 24 hours of receipt of the complaint and will indicate the issue has been documented in the NET Management System and will be addressed.
G. All complaints will be resolved as identified within the Client specific contract and/or protocols. Any complaint not resolved in that timeframe will be considered delinquent.
H. The QSCs will provide education to pertinent stakeholders as part of the resolution process.
I. If the complaint is found to be unsubstantiated at the time of the investigation, the complaint is coded as an unsubstantiated complaint and the transportation provider is notified by the QSC. (Note: Even if the complaint is found to be unsubstantiated, the complaint is documented on the Client monthly report.)
J. QSCs use a standard format for reports sent to Clients.

K. All Quality Reports are sent to the Client per Client contract via their FTP Server. HIPAA Privacy Rule 45 CFR 164.530 confidentiality clause, password protected, encrypted, or a secured server. (Note: Weekly reports are sent to Clients per contractual requirements.)
L. QM staff maintains discretion and confidentiality in all complaint situations.
M. All complaints will be tracked and trended monthly and presented to Quality Management and Network Management for recommendations on follow up and/or Performance Improvement Plans if the transportation provider is consistently not meeting quality expectation.
N. Disciplinary action recommendations will be presented to the Quality Management Committee (QMC) for approval.
O. MTM shall follow its current policies which identify the appropriate plan of action regarding vendor non-compliance and the application of appropriate performance improvement action(s).
P. Complaints are reported to the Quality Management Committee on a quarterly basis for tracking, trending, and quality improvement.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Quality Management	Date
_____	_____
VP, Administration	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Reporting and Handling of Accidents/Incidents	**Policy No.:**	408
Authorized By:	President/CEO	**Date:**	8/23/2001
Department:	Quality Management	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
To define a process for handling, documenting and reporting information relating to accidents and incidents involving members.

POLICY:
All information regarding accidents and incidents will be maintained, handled and reported according to MTM established policies and procedures.

Definitions:
Client: Refers to the customer contracted with MTM to handle the covered benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, members and other terms, for MTM purposes, member is being used as a standard meaning for the Client's covered population.

Accident: Any mishap involving a subcontracted transportation provider's vehicle and a recipient. This includes, but not limited to a fender bender, blown tire, etc.

Incident: Any non-vehicular mishap involving a recipient while in the care of a MTM transportation provider. This includes, but not limited to the passenger falls while trying to enter the vehicle, a passenger falls while walking to the vehicle, etc.

Internal Alert: Any reported accident/incident which requires immediate response and direction from MTM's Executive team, including but not limited to serious cases of abuse, neglect, sexual misconduct or injury, threat of or attempted suicide, missing person or death.

RESPONSIBILITY:

1. All accidents/incidents are reported directly to the Quality Management Department (QM). Reporting timeframes shall be as follows:
    a. All accidents/incidents considered an "Internal Alert" shall be reported by the Compliance Auditor to:
        i. MTM's Executive VP
        ii. General Counsel
        iii. Director, Quality Management
        iv. Director, Provider Network
        v. Director, Client Services
        vi. The Client
    b. All other accidents/incidents shall be reported to the appropriate parties in accordance to the contractually obligated timeframe.
    c. Information received is to be logged immediately into the appropriate documentation systems and the Non-Emergency Transportation (NET) Management System in which information is logged and maintained.
2. The Incident/Accident Facilitator will request the transportation provider complete an accident/incident form and submit it to MTM QM Department within twenty-four hours of the accident/incident.
3. Regardless of the type or severity of an accident /incident, MTM retains the right to require a driver submit to drug/alcohol testing when deemed necessary:
    a. When necessary, alcohol testing should be performed within two (2) hours following the event in question
    b. If alcohol testing within two (2) hours of the event is impossible, the testing should be performed as soon as possible, not to exceed eight (8) hours from the time of the event. Documentation explaining why the testing could not take place within the allotted timeframe must be retained.
    c. When necessary and as with alcohol testing, drug testing should be performed as soon as possible following the event in question.
    d. If immediate drug testing is not possible and testing does not occur within thirty-two (32) hours from the time of the event, the employer should cease any further attempts to have the testing preformed and documentation explaining why the testing could not take place within the allotted timeframe must be retained.
4. Once the results are back, the Network Management designee will work with the owner or managing official of the company regarding the results. If the results are found to be negative, the driver will be allowed to continue working.
5. In the event of an Internal Alert, the following must be informed:
    a. Director, Quality Management

   b. Director, Provider Network
   c. Account Executive, Client Services
   d. Vice President, Business Development & Client Services
   e. Marketing designee (if the media is involved)
   f. Vice President, Administration
   g. Executive VP and General Counsel
   h. President/CEO
6. The Executive VP and General Counsel will determine if MTM's Liability Insurance Carrier is to be notified.
7. All reports of the accident/incident will be documented and saved electronically. The Compliance Auditor will check MTM records for copies of current insurance, driver training records, driver background check and DMV record for the driver involved.
8. When there is a fatality involved, Network Management will complete an on-site visit within 3-5 business days. If deficiencies are found, all future trips may be cancelled until corrected. Whenever there is a loss of human life, each surviving safety sensitive employee operating the vehicle at the time of the accident/incident must be tested. Safety-sensitive employees not in the vehicle (e.g., attendants), whose performance could have contributed to the accident/incident must also be tested.
9. The Executive VP and General Counsel reserves the right to determine the necessity of an on-site visit and the time line of completion regardless of the circumstances.
10. All inquiries by the media will be forwarded to the Marketing designee and the Executive VP and General Counsel.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Quality Management	Date
_____	_____
VP, Administration	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Management of Grievances and Appeals	**Policy No.:**	410
Authorized By:	President/CEO	**Date:**	5/31/2001
Department:	Quality Management	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
To provide an infrastructure for defining the requirement for the complaint, grievance and appeals process.

POLICY:
All complaints, grievances and appeals are channeled through the Quality Management Department for documentation, investigation, resolution, and follow up and reporting. Complaints, grievances and appeals are given immediate and appropriate attention and may be originated by a health care provider or medical home, MTM passenger, MTM transportation provider, or MTM client. All records of complaints, grievances and appeals shall be maintained for ten (10) years following a final decision of closure of the grievance and/or appeal, or longer if contractually obligated. All records shall be maintained in accordance with HIPAA guidelines 45CFR 164.530.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the covered benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, members and other terms, for MTM purposes, member is being used as a standard meaning for the Client's covered population.

MTM Provider: Refers to the contracted transportation provider performing transportation services.

Grievance: Refers to any complaint or dispute, other than one involving an organization determination, expressing dissatisfaction with the manner in which a [Client] or delegated entity provides health care services, regardless of whether any remedial action can be taken. A [member] or their representative may make the complaint or dispute, either orally or in writing, to a [Client], provider, or facility. An expedited grievance may also include a complaint that a [Client] refused to expedite an organization determination or reconsideration, or invoked an extension to an organization determination or reconsideration time frame.

In addition, grievances may include complaints regarding the timeliness, appropriateness, access to, and/or setting of a provided health service, procedure, or item. Grievance issues may also include complaints that a covered health service procedure or item during a course of treatment did not meet accepted standards for delivery of health care.

Appeal: Refers to any written expression of continued dissatisfaction after the written resolution of a grievance. An appeal is the formal mechanism which allows a request for review of an action/decision of MTM. Appeals must be filed within the Client established timeframes and contractual obligations.

Transportation Provider: Refers to an MTM vendor providing the transportation service to a member.

Warm Transfer: Refers to a process where MTM is not delegated by the Client to handle complaints or for a specific process where the member needs additional assistance. In a Warm Transfer, the member will be transferred as directed by the Client to a location (phone number) other than MTM

Members' Rights

- Members shall have the right to file a grievance about any matter related to their services, without concern of reprisal from MTM, its employees, or providers.
- MTM will provide all members written notice of the grievance procedures upon denial of services, member request for appeal or grievance, or at the member's request.
- A written grievance request shall be mailed directly to MTM's Quality Management Department at the following address:

  Medical Transportation Management, Inc.
  16 Hawk Ridge Dr.
  Lake St Louis, MO 63367
  Attn: Grievance and Appeals

RESPONSIBILITY:

1. All MTM service operations shall strictly adhere to the established procedures and requirements, and will ensure that members' issues are appropriately routed to the Quality Management Department in a timely manner.
2. MTM shall provide whatever accommodations necessary to assist language, visual, hearing or other impaired members with filing a grievance.
3. The Quality Management Department will follow the steps listed below:
    a. In accordance with all applicable contracts and regulations as well as all other applicable state and federal laws and regulations, establish and maintain grievance processes and procedures.
    b. Adhere to the protocols for receiving and handling grievance requests via phone, letters, emails and/or faxes.
        i. All standard and expedited grievances received from a member, member's representative, or provider on behalf of a member (where applicable by state/contract) during normal business hours shall be handled in accordance with the established procedures.
        ii. All standard grievances received from member, member's representative, or provider on behalf of a member (where applicable by state/contract) after normal business hours will have the option to leave a message and shall receive a call back the next business day.
        iii. All expedited grievances received from a member, member's representative or provider on behalf of a member (where applicable by state/contract) after normal business hours via the toll-free number will have the option to leave a message, and shall receive a call and resolution within seventy-two (72) hours of receipt.
        iv. Grievance Appeals acknowledgement letters shall be mailed within fifteen (15) business days of receipt. (Only applicable in those contracts where required).
        v. Acknowledgement letters must include: the name and telephone number of the person working on the grievance and, if applicable, a request for any additional information needed to investigate the grievance.
    c. The Quality Management Department will involve all operational areas that need to be involved in the resolution of the grievance.
4. Up to 14 calendar days extension may be requested by the member or provider on behalf of a member where applicable by State regulation, on member's behalf (written or verbal). MTM may also initiate an extension if member/provider can justify a need for additional information and if the extension is in the member's best interest. In all cases, extensions must be well documented.

5. Provide prompt notification to the member using an approved notice (letter) regarding MTM's plan to take up to 14 calendar day extension on a grievance case.
6. Complaints may include both grievances and appeals. Complaints can be processed under the appeal procedures, under the grievance procedures, or both depending on the extent to which the issues wholly or partially contain elements that are organization determinations. If a member addresses two or more issues in one complaint, then each issue shall be processed separately and simultaneously (to the extent possible) under the proper procedure. Cases involving an Appeal complaint shall be forwarded to the Appeals Department for processing and resolution.

Grievance Processing and Resolution

Upon receipt of the assigned grievance, the Quality Management Coordinator shall determine the type of grievance and allowable timeframes for resolution:

1. Where applicable by State regulations, if a complaint/grievance cannot be resolved immediately (same day), then the issue will be handled by the Quality Management Department via the established protocols. The Quality Management Coordinator shall determine if the grievance should be processed as expedited or standard. The member shall be notified via telephone and an acknowledgement letter shall be mailed within the specified time.
2. An expedited grievance shall be processed if it's determined that a delay would seriously jeopardize the member's life, health, or ability to attain, maintain, or regain maximum function, as applicable by state/contract.

Record Keeping

1. Maintain a file on each grievance within MTM's system for review and audit purposes that must include (at a minimum):
    a. The date the grievance was filed and a copy of the grievance
    b. The date of receipt and a copy of the member's acknowledgement letter
    c. All member/provider requests for expedited grievances and MTM decision about the request
    d. Necessary documentation to support extensions, and
    e. The decision made by MTM, including the date of the decision, titles, and in the case of clinical decision, the credentials of MTM's personnel who reviewed the grievance
2. Log each grievance into the NET Management System and enter all actions taken and decisions into the appropriate system.
3. All documents and records shall be maintained for a period of 10 years from the termination date of the contract, or per Client specifications.

Reporting

1. Track, trend, and report grievances, both internally (Quality Management Committee) and to the appropriate state regulators, for the purpose of identifying opportunities for improved care and/or services to members.
2. All grievances shall be reported monthly, quarterly, and annually to appropriate committees and state/ plan regulators, with reports analyzed to identify outstanding issues and adverse trends.
3. Grievance reporting to the appropriate state/plan shall be submitted as deemed appropriate by state regulations/requirements.

   NOTE: transportation provider grievances and appeals are handled in the same manner as member grievances and appeals. Both transportation providers and members can request a State Fair Hearing at any time during the appeal process.

Details and timing of any grievance, appeal or State Fair Hearing are based upon contractual requirements per MTM Client and the Centers for Medicare & Medicaid Services (CMS).

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Quality Management	Date
_____	_____
VP, Administration	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Policy Approval	**Policy No.:**	416
Authorized By:	President/CEO	**Date:**	9/28/2001
Department:	Quality Management	**Last Revised:**	5/1/2014
Applicability:	Quality Management		

PURPOSE:
To develop a consistent process for the development and/or revision of organizational policies and procedures.

POLICY:
The Quality Management Department (QM) is responsible for maintaining the most current electronic directory of policies and procedures. Management staff is responsible for developing and maintaining operational policies and procedures applicable to their functional areas. On at least an annual basis, departmental policies are reviewed, revised as necessary, and approved by the Quality Management Committee (QMC). Management and Executive staff will sign the policies. Management staff is responsible for advising their staff regarding new and reviewed/revised policies and procedures.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:

New Policy and Procedures

A. Using the established template for either a policy or a procedure, insert text as it should read, keeping in mind policies are meant to be Corporate policies suitable for general information and procedures are meant to explain any necessary details or processes to support a Corporate policy or to support a specific process not directly related to a Corporate policy.
B. Send the new policy or procedure (via e-mail) to the Quality Management Department for number assignment and tracking purposes.
C. The policy will be numbered and sent to the QMC members for voting to approve/deny the policy as is or they may submit suggested adjustments before they are willing to approve. There are seven (7) members of the QMC committee that are part of the voting group; policy approval requires a majority vote. NOTE: any policy that needs immediate approval will be sent with high priority and a notification stating why there is an immediate need for approval.
D. The policy is put on the next QMC meeting agenda and the meeting minutes will reflect discussion was had related to the policy.
E. If changes were recommended and agreed upon, changes will be made by QM. QM may request assistance from the submitting department with making the changes to ensure the policy is correctly written to address the topic.
F. Once the policy is completely accurate as intended, QM will ensure all necessary signatures are captured and the policy will be saved to the permanent location for all policies and procedures.
G. QM will ensure the policy is uploaded to the MTM intranet for staff access.
H. Management staff of each department is responsible for educating their department on the new policies and procedures.
I. Management Staff of each department is responsible for reviewing departmental policy and procedures at a minimum on an annual basis.
J. If revisions are required or a policy transfers from one department to another, the revisions or the department change must follow the established approval process and QM will address gaining QMC approval using the same steps listed above.

NOTE: Policies must be reviewed and approved through the QMC on an annual basis. Procedures do not need QMC approval annually but must have the Manager, Director or Executive in charge of the department review and sign-off annually.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Quality Management	Date
_____	_____
VP, Administration	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Denial Letters	**Policy No.:**	429
Authorized By:	President/CEO	**Date:**	4/26/2001
Department:	Quality Management	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
Sending written notification of the reason for denied transportation requests to members per client contractual obligation. Trips are denied based on established Client protocols

POLICY:
Client approved form letters with appeal language are computer-generated daily and mailed to members.

Definitions:
Client: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms, for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:

1. After denying transportation and advising the member of their rights for appeal, the customer service representative (CSR) will code the trip in the NET Management System with the proper denial code.
2. On a daily basis, a computer-generated form letter is created for each denied trip. Each letter will contain:
    a. Member's name and address
    b. Date transportation was requested
    c. Date of the appointment
    d. Reason the trip was denied
    e. Rights to appeal information

3. The Claims Department will print the letters.
    a. Each members file will be documented with the date the denial letter was mailed.
    b. The letters will be mailed to the member within timelines identified per contractual guidelines.
    c. A denial report will be submitted to the client based on contractually obligated timeframes.
4. Denial trends will be reviewed by the Client Services Account Executive and with specific clients, as indicated.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Quality Management	Date
_____	_____
VP, Administration	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Performance Improvement Plan Process-Transportation Provider	**Policy No.:**	440
Authorized By:	President/CEO	**Date:**	12/6/2004
Department:	Quality Management	**Last Revised:**	5/1/2014
Applicability:	Quality Management		

PURPOSE:
To establish a process for Performance Improvement Plan implementation, follow-up, tracking, trending and resolution.

POLICY:
Periodic audits are performed as requested by the Quality Management Committee (QMC), Credentialing Committee and Executive Management to determine that processes are occurring internally or externally.

These processes include but are not limited to:

- compliance
- on-site vendor assessment
- occurrences such as grievances
- accidents/incidents
- other non-compliance to specific contract language and agreements

As determined by Executive Management, Performance Improvement Processes are instituted and Performance Improvement Plans are developed to outline the necessary correction to specific infractions and/or occurrences.

Definitions:
Client: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms, for MTM purposes, member is being used as a standard meaning for the Client's covered population.

Performance Improvement Plan: A specific plan of action which speaks to the specific infractions of the current contract and/or provider guidelines and which identifies action taken, responsible party, timeline for initiation of the performance improvement process, timeline for completion and increments of follow-up and associated compliance therein.

Liquidated Damages: The assessment of specific penalties associated with failure to strictly perform and comply with the terms, conditions, performance standards and criteria.

RESPONSIBILITY:

1. Initiation of a Performance Improvement Plan is the primary responsibility of the Manager, Quality Management or designee. Performance Improvement Plans may be instituted for, but not limited to, the following:
    a. Identification of non-compliance with contractual agreement
    b. Grievances
    c. Accidents/Incidents
2. The results of a Performance Improvement Plan determine whether the responsible party will be required to receive on-site education and sign a Performance Improvement Plan.
    a. The responsible party will be required to sign a Performance Improvement Plan that addresses each area that needs improvement.
    b. The responsible party will be given a specific timeframe in which to make necessary changes and improvements that were addressed in the Performance Improvement Plan.
    c. A follow-up compliance site visit may be conducted within the specified time frame in which improvement should have occurred.
    d. If the results of the follow-up visit/audit reveal the responsible party has not made recommended improvements that meet MTM's standard of compliance, the responsible party may be required to sign a second Performance Improvement Plan and receive additional on-site education.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Quality Management	Date
_____	_____
VP, Administration	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Fraud, Waste and Abuse Prevention and Investigation	**Policy No.:**	443
Authorized By:	President/CEO	**Date:**	9/15/2003
Department:	Quality Management	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
MTM has an ethical, legal, and fiduciary duty to ensure procedures for fraud, waste and abuse (FWA) prevention, detection, investigation, and reporting are effective and consistent with the Centers for Medicare and Medicaid Services (CMS) and client requirements.

POLICY:
The Quality Management Department (QM) will make every effort to reduce, prevent, and report issues of FWA in accordance with CMS and client requirements.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

Fraud: Refers to an intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to himself or some other person. It includes any act that constitutes fraud under applicable Federal or State law.

Waste: Refers to over-utilization of services or other practices that result in unnecessary costs. Waste is generally not considered to be caused by criminally negligent actions but rather the misuse of resources.

Abuse: Refers to practices that are inconsistent with sound fiscal or business practices and result in an unnecessary cost to the Medicaid program, or in reimbursement for services that were not performed.

RESPONSIBILITY:

A. QM will investigate all reported incidents of suspected FWA with all results being supplied to the Client on at least a monthly basis, or upon Client contractual requirements.
B. Each suspected incident of FWA is handled in the same basic manner, whether the incident is related to a member, transportation provider, medical facility or any other source; an issue deemed more serious in nature will be given highest priority.
C. QM will make recommendations to MTM Executive staff and/or the Quality Management Committee (QMC) when it is deemed that a more thorough and focused review is necessary regarding specific incident(s) of suspected FWA. Particularly, when a member is being recommended for a more focused review, the Client is immediately notified for their input and direction.
D. Transportation providers contracted with MTM to provide services are subject to disciplinary actions up to and including termination from the MTM Network if it is reasonably believed that they have committed some actions of FWA. MTM's Executive Vice President, General Counsel has the final determination to terminate a transportation provider from the MTM Network any time FWA is suspected.

FWA TRAINING:

A. All MTM staff members are annually trained on FWA and training is documented. New employees are trained immediately upon hire.
B. In compliance with rules established by CMS, MTM has ensured that FWA training is available to all First Tier, Downstream, and Related Entities. MTM's FWA training presentation is available on the MTM website.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Quality Management	Date
_____	_____
VP, Administration	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Quality Performance – Call Monitoring Process and Evaluation	**Policy No.:**	468
Authorized By:	President/CEO	**Date:**	6/1/2000
Department:	Quality Management	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
To make certain the Quality Performance Standards and Expectations put forth by MTM for its Clients are being met or exceeded to ensure compliance with established goals.

POLICY:
All inbound and outbound calls are recorded and monitored monthly for all MTM Call Center personnel, in accordance with the MTM Quality Observation Scoring Guidelines. In addition to Call Center personnel, other Department Staff calls may be pulled for review and evaluation as requested by Management or Clients.

Definitions:
Client: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population.

Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms, for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:
With respect to the Call Center personnel the appropriate recorded calls will be obtained and the following are the measurable categories;

1. Ten (10) audits for each Customer Service Representative (CSR) per month where the CSR is reviewed on their overall call handling skills. Individual phone reports are completed for each reviewed call, along with the cumulative results. Items reviewed include but are not limited to:

    a. Ensure Client Protocols are being met
    b. Verify excellent Customer Service is being provided
2. Queries for each trip associated with each audited call
    a. Ensure Proper and correct data entry
    b. Verify informative information has been placed into the notes so other customer service staff can quickly understand the given situation
    c. Ensure the most appropriate transportation provider is selected
3. During the review process any areas not meeting MTM Quality Indicators will be forwarded to Call Center Coaching Staff for documentation and continued CSR training and education.
4. Results of the call monitoring will be reported to the Management on a monthly basis for tracking, trending and quality improvement.
5. Call monitoring outcomes are reported to QMC on a quarterly basis and to MTM Client's based on contractual obligations.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Quality Management	Date
_____	_____
VP, Administration	Date
_____	_____
President/CEO	Date

Corporate Procedure

Subject:	Consumer (Member) Satisfaction Surveys	**Procedure No.:**	202.001
Authorized By:	Director, Call Center Operations	**Date:**	11/12/2012
Department:	Customer Service Center	**Last Revised:**	5/1/2014
Applicability:	Customer Service Center		

PURPOSE:
To obtain customer satisfaction information from members calling MTM to utilize the transportation benefit.

POLICY:
Policy 202 Customer Service Center Telephone Conduct

RESPONSIBILITY:

G. Member satisfaction surveys are conducted on a continual basis by a third party provider.
H. Surveys are conducted a maximum of once every thirty (30) days per member.
I. Surveys are conducted from a statistically valid sample based on member utilization.
J. Survey results are compiled and presented to MTM Clients on a monthly basis.
K. Survey results are evaluated to identify additional training needs with MTM call center staff.
L. Survey results are reported to the Quality Management Committee (QMC) on a quarterly basis.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____
Director, Call Center Operations Date

9.0 Claims

Overview

We have developed a user-friendly claims process supported by automated systems, tested with a focus group of NEMT providers, and proven successful in real-life claims submission. The following narrative describes the claims process, which is accessible by every transportation provider across our book of business.

1. **Online Trip Information Entry:** Using the secure online portal, the transportation provider will electronically upload pick-up and drop-off information, vehicle identification number, and driver's license number.

   The online tool allows the provider to make corrections at his/her convenience. The status of each claim and all associated data will be available online, searchable, and accessible on a trip-by-trip basis. The weekly rosters identifying assigned trips also will be available online. For transportation providers with routing and scheduling software, MTM supports batch file processing of the required information to eliminate data entry, resulting in a higher level of efficiency for all parties.

2. **Non-Online Transportation Claims Processing:** Transportation providers that cannot upload their claims online due to lack of internet access or other limitations will be given the option of sending their trip logs and other documentation into the main office via certified mail, email, or fax.

3. **Validation of Signatures and Information:** Our Trip Reconciliation staff will review all documentation for completeness and compliance.
   a. Claim Approved: Upon the receipt of a clean claim and following successful review of all supporting documentation, the trip claim moves to step three of this process.
   b. Claim Denied: Reasons for denial may include lack of supporting documentation, discrepancy between information in our system vs. provider claim, or usage of a non-credentialed driver/vehicle.
      i. Transportation Provider Notified: The online tool keeps the provider informed of the status of each claim throughout the claims process.
      ii. Transportation Provider Appeals: If the provider does not agree with the automatic adjudication, then s/he may request an appeal online. We strive to

resolve all disputes within two weeks. Because most of the information is supplied directly by the transportation provider, appeals should be limited in nature and quantity. Our claims staff will address the appeal and work with the provider to resolve the issue. The transportation provider must follow a structured online process identifying the grounds for the appeal and supply supporting evidence, if applicable. If the transportation provider does not make an appeal by the appeal deadline, the trip will close out and no appeals will be allowed after that date.

iii. Appeal Review Approved: The Claims Department will review supplementary information. Following evaluation, this department will annotate the trip as approved and the trip claim will move to step three. This will occur within two weeks of receiving additional information. As needed, we will request additional information.

iv. Appeal Review Rejected: The review does not justify making payment for a trip. Our online tool will update the provider on the status of the trip claim.

4. **Payment Authorized:** Upon the successful completion of the above process, the transportation provider will receive payment for approved trips via check or an Automated Clearing House (ACH) transaction. In accordance with DHCFP specifications, we will pay 90% of network providers, members, and volunteers within 45 business days after submission of a clean claim, and 99% will receive payment within 90 business days.

Claims Policies and Procedures

Policy 601	Non-Online Transportation Providers Claims Processing
Policy 602	Denial of Payment or Services
Policy 605	Claims Web Application – Claim Approval Timeframe & Payment Schedule
Policy 606	Claims Web Application – Trip Submissions and Claims
Policy 607	Claims Web Application – Approved Drivers and Vehicles
Policy 608	Claims Web Application Appeal Process
Policy 609	Mileage Reimbursement
Policy 610	Mileage Reimbursement Attendance Verification
Procedure 601.001	Trip Log Processing
Procedure 601.002	Signature Verification
Procedure 601.003	Documentation Retention
Procedure 601.005	Taxi Cab Providers
Procedure 601.006	Independent Contractors
Procedure 601.007	Invoice Providers
Procedure 602.001	Denial of Payment or Services Letters
Procedure 605.001	Claims Web Application – Claim Approval Timeframe and Payment Schedule
Procedure 606.001	Claims Web Application – Trip Submissions and Claims
Procedure 607.001	Claims Web Application – Verification of Drivers and Vehicles
Procedure 608.001	Claims Web Application - Appeals
Procedure 610.001	Mileage Reimbursement Attendance Verification

Corporate Policy

Subject:	Non-Online Transportation Provider Claims Processing	**Policy No.:**	601
Authorized By:	President/CEO	**Date:**	5/1/2013
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To ensure transportation providers that do not use the Claims Web Application can still receive payment for services rendered.

POLICY:
Transportation providers that cannot upload their claims online, due to lack of internet access or other limitations, will be given the option of sending their trip logs and other documentation into the main office via mail, email, or fax.

DEFINITIONS:
Transportation Providers: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population. They are also known as Clients.

Claims Web Application: The Claims Web Application is an online tool utilized by transportation providers and MTM to facilitate timely and accurate payment of services rendered.

RESPONSIBILITY:
The Claims Department shall manage mailed, faxed, or emailed trip logs from the transportation providers as follows:

A. Paper documents shall be sent to the Claims Department via certified mail, email, or fax.
B. Upon arrival, data shall be labeled, logged, and date stamped.
C. Data shall be sorted by region and week ending date then stored according to date.
D. Data shall be entered by the Signature Entry Team according to the region and week ending date through the MTM Operational System.

E. Any necessary reconciliation or issuing of reports and payment summaries shall be completed by the Trip Reconciliation Specialists.
F. Data shall be logged as completed.
G. Data shall be scanned to a secure network drive by transportation provider name and week ending date. Data is backed up nightly.
H. Data shall be boxed and labeled according to date including destruction date then logged in the Storage Log.
I. Data is stored in boxes in a secure storage facility until the designated destruction date.
J. Data will be shredded and recycled no earlier than 10 years after week ending date.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Claims	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Denial of Payment or Services	**Policy No.:**	602
Authorized By:	President/CEO	**Date:**	5/1/2013
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To ensure the member has full understanding of why mileage reimbursement payment or transportation has been denied.

POLICY:
For many plans, written notification must be provided to the member for denial of mileage reimbursement or transportation and include the reason for the denial. A member has the right to request and receive a detailed written notice of the denial of payment. Denials may occur even with claims where there is proof the trip occurred.

DEFINITIONS:
Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

Mileage Reimbursement: Refers to the monetary reimbursement issued to members that qualify for transportation but can provide it on his or her own behalf. There are several restrictions and requirements.

RESPONSIBILITY:
The Claims Department shall promptly send denial of payment/services letters as follows:

A. Denial letters are auto-generated by MTM's system.
B. Denial letters shall be printed, copied, logged, stuffed in envelopes, addressed, and mailed daily.
C. The MTM Operational System notes section shall be updated for each denial letter.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Claims	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Claims Web Application – Claim Approval Timeframe & Payment Schedule	**Policy No.:**	605
Authorized By:	President/CEO	**Date:**	5/1/2013
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To make transportation providers aware of payment schedule and timeframe established by Accounting, and to ensure transportation providers are paid in a timely manner for trips claimed through the online Claims Web Application.

POLICY:
Transportation Providers shall be paid according to Accounting's established payment cycle as long as clean claims are submitted according to schedule.

DEFINITIONS:
Transportation Providers: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population. They are also known as Clients.

Claims Web Application: The Claims Web Application is an online tool utilized by transportation providers and MTM to facilitate timely and accurate payment of services rendered.

RESPONSIBILITY:
Each provider's claim approval timeframe and payment schedule will be outlined as follows:

A. MTM Accounting shall establish a payment cycle for the entire year in advance. The payment cycle will define dates of transport, claims submission, and payment.
B. This payment cycle will be distributed to Network Management then to the transportation providers as they sign up for the claims web application. If the provider is already utilizing the claims application, payment schedules will be available before the close of each year for the next year.

C. Provider is responsible for submitting claims through the claims web application in accordance with the defined payment schedule.
D. Claims must be approved for payment more than 2 days before the scheduled pay date to be included on the payment. Claims approved for payment within 2 days or less of the payment scheduled date will be paid on the next scheduled pay date. Payment for claims will not be made sooner than identified on the payment schedule.
E. Trips that have been appealed will be paid if the appeal is overturned. The payment will be included in the next scheduled payment cycle.
F. Provider is responsible for monitoring pay dates.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Claims	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Claims Web Application – Trip Submissions and Claims	**Policy No.:**	606
Authorized By:	President/CEO	**Date:**	5/1/2013
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To define the method in which Transportation Providers can upload signature documents and submit claims real time via MTM's Claims Web Application.

POLICY:
Transportation providers will be given the ability to claim trips within their contractually specified timeframes with supporting signature documentation via MTM's online claims application.

DEFINITIONS:
Transportation Providers: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population. They are also known as Clients.

Claims Web Application: The Claims Web Application is an online tool utilized by transportation providers and MTM to facilitate timely and accurate payment of services rendered.

RESPONSIBILITY:
The method in which Transportation Providers can upload signature documents and submit claims via MTM's Claims Web Application is outlined as follows:

1. All claims must be submitted within the specified timeframe. Timeframes are mandated by any applicable regulation and/or Client specific contracted obligations. Claims can be submitted by adding them to a packet of one or many claims.
2. Claims made prior to the date of service will not be allowed.
3. Transportation providers must provide all required compliance data when uploading a claim.

4. The provider is responsible to verify that all trip costs displayed are accurate and may not be negotiated after the trip is claimed. If the transportation provider feels a trip cost is incorrect, they should remove the claim from the packet so as not to submit it and contact the Transportation Provider Helpdesk at 1-877-892-3997.
5. After the packet is submitted, the provider will no longer be able to edit or delete any of the claims that were added to the packet.
6. MTM will review submitted packets daily and verify signatures for corresponding trips.
7. A packet is verified when all the claims in the submitted packet are viewed.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Claims	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Claims Web Application – Approved Drivers and Vehicles	**Policy No.:**	607
Authorized By:	President/CEO	**Date:**	5/1/2013
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To ensure that Transportation providers only use approved drivers and vehicles for transporting members and filing claims for payment via MTM's Claims Web.

POLICY:
In order for Transportation providers to claim for payment and to be paid by MTM, they must use only pre-approved credentialed drivers and vehicles for all claims they submit for payment via the Claims Web Application.

DEFINITIONS:
Transportation Providers: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population. They are also known as Clients.

Claims Web Application: The Claims Web Application is an online tool utilized by transportation providers and MTM to facilitate timely and accurate payment of services rendered.

RESPONSIBILITY:
The method Transportation Providers must use to ensure they are using credentialed and pre-approved drivers and vehicles is outlined as follows:

1. The provider shall only use approved drivers and vehicles as identified by the Credentialing Web Application. It is the provider's responsibility to upload all applicable credentials to the Credentialing Web Application for approval before any trips are taken by that driver or vehicle.

2. Network Management shall approve or deny the driver/vehicle credentials in a timely manner. It is only after the driver/vehicle has been approved by Network Management that the driver/vehicle may be used by the provider to transport for MTM.
3. If the credentialing web application identifies a driver and/or vehicle as not approved and the provider finds this to be in error, they must contact their Network Representative prior to using the driver or vehicle in question.
4. The provider is responsible for making sure all driver and vehicle credentials are up to date and approved before they are used to provide services for MTM.
5. MTM shall perform random audits of trips to ensure that a proper driver and/or vehicle was used.
6. Failure to identify an approved driver/vehicle while making a claim for service may result in the claim (s) being denied.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Claims	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Claims Web Application-Appeal Process	**Policy No.:**	608
Authorized By:	President/CEO	**Date:**	5/1/2013
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To allow transportation providers using the Claims Web Application the opportunity to appeal disputed claims for payment.

POLICY:
MTM shall allow Transportation Providers the ability to dispute discrepancies on selected denials when the provider feels the denial of payment for the claim was in error.

DEFINITIONS:
Transportation Providers: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population. They are also known as Clients.

Claims Web Application: The Claims Web Application is an online tool utilized by transportation providers and MTM to facilitate timely and accurate payment of services rendered.

RESPONSIBILITY:
The method Transportation Providers must use to dispute denied claims is outlined as follows:

1. The transportation provider has the ability to dispute any denied claims within the specified timeframe. Timeframes are mandated by any applicable regulation and/or Client specific contractual obligation. The transportation provider must supply the necessary information to support disputes.
2. The transportation provider will submit the appeal via the Claims Web Application after all disputes have been addressed.
3. The MTM appeal group will review the submitted data within 30 days and either:
    - Approve the appeal
    - Determine insufficient documentation was presented and deny the appeal.

4. The MTM appeal group will update the appeal real time via the Claims Web Application.
5. The transportation provider can escalate a denied appeal within 30 days of the denial as a means of a 2nd appeal.
6. The provider must supply supporting data and/or circumstances for 2nd appeal.
7. A different Claims Representative will review submitted data and approve or deny 2nd level appeal.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Claims	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Mileage Reimbursement	**Policy No.:**	609
Authorized By:	President/CEO	**Date:**	5/1/2013
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To ensure complete trip information is gathered and authorized for an eligible participant of mileage reimbursement prior to the trip or according to the specific client's contract, and to ensure that all mileage reimbursement requests are processed in a timely and consistent manner.

POLICY:
Mileage reimbursement will be paid to eligible members at the contracted rate on scheduled pay dates for all verified requests in accordance with contractual requirements.

DEFINITIONS:
Mileage Reimbursement: Refers to the monetary reimbursement issued to members that qualify for transportation but can provide it on his or her own behalf. There are several restrictions and requirements.

Member: Refers to the population served by MTM. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:
MTM shall handle Mileage Reimbursement as follows:

A. Eligible members will call in to the MTM Customer Service Center.
B. The CSR will capture all relevant information during call intake and verify the member's eligibility by meeting all protocols or guidelines established by the member's plan.
C. Requests must be made by the member in accordance with the timeframe set forth by the member's plan. Requests that fall outside the timeframe will be denied.
D. The Gas Mileage Reimbursement Team will conduct attendance verification.

E. The GMR Team will handle basic mileage disputes and forward any check re-issuing requests to the Accounting Department.
F. Formal Mileage Reimbursement Appeals will be filed through Quality Management.
G. The Accounting Department will handle lost or missing check investigations.
H. The Quality Management staff will conduct random audits on the mileage reimbursement process to validate compliance with the policy.
I. The Quality Management staff will inform the GMR Team of the audit's findings then offer corrective actions plans when necessary.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Claims	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Mileage Reimbursement Attendance Verification	**Policy No.:**	610
Authorized By:	President/CEO	**Date:**	5/1/2013
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To verify that an eligible member seeking mileage reimbursement attended the appointment for which they are seeking reimbursement.

POLICY:
Attendance verification shall be conducted on mileage reimbursement requests for the required plans through facility signature logs. 10%-20% of facility signature logs will be additionally verified through verbal contact with the facility.

DEFINITIONS:
Mileage Reimbursement: Refers to the monetary reimbursement issued to members that qualify for transportation but can provide it on his or her own behalf. There are several restrictions and requirements.

Member: Refers to the population served by MTM. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:
The Gas Mileage Reimbursement Team shall handle Mileage Reimbursement Attendance Verification as follows: (see Claims Manual for detailed instructions)

A. Attendance verification will be completed by GMR for all mileage reimbursement requests based on contract requirements through facility signature logs.
B. The GMR Team will receive, verify, and process the logs.
C. The GMR Team will conduct a follow-up verification on 10%-20% of all the aforementioned trip logs through verbal contact with the facility.

D. The GMR Team will document all relevant information from the logs in the MTM Operational System.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Claims	Date
_____	_____
VP, Operations	Date
_____	_____
President/CEO	Date

Corporate Procedure

Subject:	Trip Log Processing	**Procedure No.:**	601.001
Authorized By:	Manager, Claims	**Date:**	5/30/2014
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To ensure that trip logs or other documents sent to MTM via certified mail, email, or fax are tracked and remain organized.

POLICY:
Policy 601-Non-Online Transportation Providers Claim Processing

DEFINITIONS:
Transportation Providers: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population. They are also known as clients.
Claims Web Application: The Claims Web Application is an online tool utilized by transportation providers and MTM to facilitate timely and accurate payment of services rendered.

RESPONSIBILITY:
Transportation providers that cannot upload their claims online, due to lack of internet access or other limitations, will be given the option of sending their trip logs and other documentation into the main office via mail, email, or fax.

The Claims Department shall manage mailed, faxed, or emailed trip logs from the transportation providers as follows (see CLAIMS PROCESS MANUAL.docx for detailed instructions):

1. Transportation providers that do not or cannot utilize the Claims Web Application will send their trip logs to MTM via certified mail, email, or fax.
2. IT will email the Claims Administrator with the spreadsheet including all of the non-online providers with trips that week.
3. The Administrator will re-organize these spreadsheets to include only the required information and providers.

4. Daily, the Administrator will go to 3rd floor reception to obtain any mailed trip logs. They will also check their inbox for any faxed or emailed logs from coworkers.
5. The Administrator will go through all the packages and distribute any documents to the necessary people.
6. Each package should be analyzed thoroughly and the logs should be sorted by week-ending.
7. Each week-ending packet should be checked into the necessary spreadsheet for the corresponding week-ending.
8. The logs shall be labeled with region, vendor code, week-ending, and date stamped with the date received and then initialed.
9. The logs should be distributed to the Verification or Appeal Specialists for entry.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Manager, Claims Date

Corporate Procedure

Subject:	Signature Verification	**Procedure No.:**	601.002
Authorized By:	Manager, Claims	**Date:**	5/30/2013
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To ensure transportation providers that do not use the Claims Web Application receive payment for services rendered by verifying trip logs for required information.

DEFINITIONS:
Transportation Providers: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population. They are also known as clients.
Claims Web Application: The Claims Web Application is an online tool utilized by transportation providers and MTM to facilitate timely and accurate payment of services rendered.

POLICY:
Policy 601 Non-Online Transportation Providers Claim Processing

RESPONSIBILITY:
Transportation providers that cannot upload their claims online, due to lack of internet access or other limitations, will be given the option of sending their trip logs and other documentation into the main office via mail, email, or fax.
The Claims Department shall verify the signatures on the trip logs from the transportation providers as follows (see CLAIMS PROCESS MANUAL.docx for detailed instructions):

1. Daily, the Verification Specialist will obtain any trip logs from the Claims Administrator.
2. The logs will be labeled with region, vendor code, and week-ending. This information will be used to verify the signatures in the AS400.
3. For Hamilton County trip logs, the verification will be done in the Hamilton County section of the AS400. Enter the letter code to select the provider. Then enter each trip leg ID number that has an accompanying signature.

4. For Non-Hamilton providers, the verification will be done in the Data Entry screen of the AS400. Enter the 4 digit vendor code to select the provider. Then enter each trip number that has an accompanying signature and place a 1 on the signature line. If there are 2 signatures, enter a 2 on the line.
5. Any invalid trip numbers will be circled and noted with the issue.
6. After the packet is complete, it will be logged in the Signature Verification Spreadsheet as complete.
7. The trip logs will be taken to the Claims Administrator for documentation retention.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Manager, Claims Date

Corporate Procedure

Subject:	Documentation Retention	**Procedure No.:**	601.003
Authorized By:	Manager, Claims	**Date:**	5/30/2013
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To ensure that trip logs from the transportation providers that do not use the Claims Web Application are electronically saved into a secure network and filed in a secure storage facility.

DEFINITIONS:
Transportation Providers: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population. They are also known as clients.
Claims Web Application: The Claims Web Application is an online tool utilized by transportation providers and MTM to facilitate timely and accurate payment of services rendered.

POLICY:
Policy 601 Non-Online Transportation Providers Claim Processing

RESPONSIBILITY:
Transportation providers that cannot upload their claims online, due to lack of internet access or other limitations, will be given the option of sending their trip logs and other documentation into the main office via mail, email, or fax.

The Claims Department shall electronically save trip logs into a secure network and file them in a secure storage facility as follows. (See CLAIMS PROCESS MANUAL.docx for detailed instructions.):

1. Daily, the Verification Specialists will drop completed packets off to the Claims Administrator.
2. The packets are scanned into electronic files using a Panasonic Reliable Throughput Imaging Viewer.
3. The packets shall be saved in the signature verification files on mtmcampus01.
4. Each provider will have its own folder in the signature verification files.

5. Each packet will be saved in the corresponding provider's folder by year, month, and then week-ending.
6. If a folder does not exist, one will be created.
7. The logs will be placed in a box and labeled with MTM's storage labels.
8. Full boxes will be logged on the Storage Log Spreadsheet in the Off Site Storage folder on the T Drive.
9. The Building Maintenance Supervisor and Administration will be informed when a box is prepared for storage.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Manager, Claims Date

Corporate Procedure

Subject:	Taxi Cab Providers	**Procedure No:**	601.005
Authorized By:	Manager, Claims	**Date:**	5/30/2013
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To ensure that the Taxi Cab providers who do not use the Claims Web Application are accurately paid for services rendered.

DEFINITIONS:
Transportation Providers: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population. They are also known as clients.
Claims Web Application: The Claims Web Application is an online tool utilized by transportation providers and MTM to facilitate timely and accurate payment of services rendered.

POLICY:
Policy 601 Non-Online Transportation Providers Claim Processing

RESPONSIBILITY:
Transportation providers that cannot upload their claims online, due to lack of internet access or other limitations, will be given the option of sending their trip logs and other documentation into the main office via mail, email, or fax.
The Claims Department shall handle Taxi Cab provider trip logs and reconciliation as follows. (See CLAIMS PROCESS MANUAL.docx for detailed instructions.):

1. Weekly, the Reconciliation Specialist will receive trip logs from taxi cab providers via certified mail, email, or fax.
2. The logs should be forwarded to the Transportation Provider Helpdesk email burst at: #TpHelpDesk@mtm-inc.net where the prices will be verified and adjusted.
3. The TP Helpdesk associate will respond to the specialist or return the logs when they have been updated.
4. The specialist will save the updated logs on the secure network drive.

5. The specialist will navigate Claims Web Application to upload the trip logs on behalf of the taxi cab provider.
6. See Part 4 Claim Reconciliation, Section 4.3 Claim Processing for detailed instructions on uploading claims online.
7. The specialist will send an email to the Signature Entry Team at #DMG-Signatures@mtm-inc.net. The email should include the provider name, code, and packet name.
8. The email should also include any additional information needed by the signature entry team. Many taxi cab providers are not required to submit signatures or use credentialed drivers/vehicles. The team will need this information to accurately verify the claims.
9. The team will respond to the email once the claims have been verified.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

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Manager, Claims Date

Corporate Procedure

Subject:	Independent Contractors	**Procedure No:**	601.006
Authorized By:	Manager, Claims	**Date:**	5/30/2013
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To ensure that the Independent Contractors who do not use the Claims Web Application are accurately paid for services rendered.

DEFINITIONS:
Independent Contractors: Refers to a select group of transportation providers who are not contracted with MTM but use credentialed drivers and vehicles. Most do not have internet access and have less stringent requirements than the contracted providers.
Transportation Providers: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population. They are also known as clients.
Claims Web Application: The Claims Web Application is an online tool utilized by transportation providers and MTM to facilitate timely and accurate payment of services rendered

POLICY:
Policy 601 Non-Online Transportation Providers Claim Processing

RESPONSIBILITY:
Transportation providers that cannot upload their claims online, due to lack of internet access or other limitations, will be given the option of sending their trip logs and other documentation into the main office via mail, email, or fax.

The Claims Department shall handle Independent Contractor trip logs and reconciliation as follows. (See CLAIMS PROCESS MANUAL.docx for detailed instructions.):

Trips for 2013 and after:

1. Trips in 2013 and after are claimed through the Claims Web Application.
2. Weekly, the Reconciliation Specialist will receive trip logs from independent contractors via certified mail, email, or fax.
3. The specialist will save the logs on the secure network drive.
4. The specialist will navigate Claims Web Application to upload the trip logs on behalf of the independent contractor.
5. See Part 4 Claim Reconciliation; Section 4.3 Claim Processing for detailed instructions on uploading claims online.
6. If the trip cost is different than expected, do not submit the packet.
7. Contact the Network Representative to confirm the rate of the disputed claim. If the rate cannot be confirmed, remove it from the packet before submitting it. The claim can be added later once the dispute is corrected.
8. Submit the packet for verification.
9. Send an email to the Signature Entry Team at #DMG-Signatures@mtm-inc.net. The email should include the provider name, code, and packet name. It should also include any additional information needed by the signature entry team. Many independent contractors are not required to submit signatures or use credentialed drivers/vehicles.
10. The team will respond to the email once the claims have been verified.
11. Every other Tuesday during the pay week, run a report for each provider with trips that week outlining credited trips and the payment amount they should receive. See the Running Reports portion of the Claims Process Manual in Part 4 Claim Reconciliation; Section 4.3 Claim Processing for detailed instructions on running reports through the Claims Web Application.

Trips prior to 2013:

1. Trips that occurred prior to 2013 will be handled in the AS400 because they occurred prior to the establishment of the Claims Web Application.
2. The specialist will receive the trip logs via email or fax. They are due bi-weekly by 12:15PM on the Monday of the pay week.
3. Save the logs in the Signature Verification files in the independent contractor folder under the proper year and provider name.
4. Save the email or fax in an Archive folder with the provider's name in Outlook.
5. Check the date of the trip:
   - If it is current, it will be entered into the AS400.
   - If it is older, it will be entered through a back billing invoice.
6. If there is a "Wait Time" on any of the logs, forward them to the appropriate Network Representative.

7. The signatures must be verified by 10AM Tuesday. See Part 2 Signature Verification; Section 2.3 AS400 Entry of the Claims Process Manual for entry instructions.
8. After entry, the specialist must run a ND Report for each provider with trips that week.
9. See Part 4 Claim Reconciliation; Section 4.5 Independent Contractors; Sub-Section 4.5A: Prior to 2013 of the Claims Process Manual for detailed instructions on running ND reports through the AS400.
10. Save the ND reports and send them to the appropriate providers.
11. The providers will have until 3PM Wednesday to contact the specialist with any issues on the ND report.
12. Correct any issues the provider has with the ND Report up until the Invoices/Payment Summaries are printed on Wednesday.
13. Re-send the updated ND reports when required and save them.
14. On Wednesday after all corrections are complete, the specialist should run the required reports for Accounting.
15. See Part 4 Claim Reconciliation; Section 4.5 Independent Contractors; Sub-Section 4.5A: Prior to 2013 of the Claims Process Manual for detailed instructions on running Invoice and Payment Summaries reports and sending them to Accounting.
16. See the Back Billing Invoices portion of the Claims Process Manual located in Part 4 Claim Reconciliation; Section 4.5 Independent Contractors; Sub-Section 4.5A: Prior to 2013 for detailed instructions on back billing.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Manager, Claims Date

Corporate Procedure

Subject:	Invoice Providers	**Procedure No.:**	601.007
Authorized By:	Manager, Claims	**Date:**	5/30/2013
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To ensure that the Invoice Providers who do not use the Claims Web Application and are not contracted with MTM are accurately paid for services rendered.

DEFINITIONS:
Invoice Providers: Refers to a select group of transportation providers who are not contracted with MTM and do not use fully credentialed drivers and vehicles. Most do not have internet access and have less stringent requirements than the contracted providers or independent contractors. They are not provided with reports from MTM. Invoice Providers include regular transportation providers as well as ambulance, cab (separate from the contracted taxi cab providers), para-lift, and stretcher trips which have a separate procedure.

Transportation Providers: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population. They are also known as clients.

Claims Web Application: The Claims Web Application is an online tool utilized by transportation providers and MTM to facilitate timely and accurate payment of services rendered.

POLICY:
Policy 601 Non-Online Transportation Providers Claim Processing

RESPONSIBILITY:
Transportation providers that cannot upload their claims online, due to lack of internet access or other limitations, will be given the option of sending their trip logs and other documentation into the main office via mail, email, or fax.

The Claims Department shall handle Invoice Provider trip logs and reconciliation as follows. (See CLAIMS PROCESS MANUAL.docx for detailed instructions.):

1. Invoice Provider rates are not configured on the AS400 so all trip prices must be verified and some rates may need to be adjusted.
2. The specialist will receive invoices via certified mail, email, or fax.
3. Each invoice will be date stamped and initialed by the specialist.
4. Send each invoice to the appropriate Contract Representative according to health plan of the invoice.
5. The Contract Representative will review the rates and either approve or deny them.
   - Any trips with a price over $150.00 must be noted in the AS400 by the Contract Representative if approved.
   - Any provider discrepancies over $50.00 must be noted in the AS400 by the Contract Representative if approved.
6. The specialist will receive the invoice back from the Contract Rep once approved.
7. Check each trip number in the AS400 and obtain the 4 digit vendor code.
8. Use the vendor code to create a Batch ID # which will be associated with the invoice.
9. Note the vendor code and Batch ID # on the invoice and save the Batch ID.
10. Enter all of the trips associated with the invoice.
11. For detailed instructions on creating Batches, entering trips, and adjusting prices see Part 4 Claim Reconciliation; Section 4.6 Invoice Providers; Sub-Section 4.6A: Paper Invoices of the Claims Process Manual.
12. Check that the trip total in the AS400 matches the total from the invoice and approve it.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Manager, Claims Date

Corporate Procedure

Subject:	Denial of Payment or Services Letters - WV	**Procedure No.:**	602.001
Authorized By:	Manager, Claims	**Date:**	8/8/2014
Department:	Claims	**Last Revised:**	
Applicability:	Claims		

PURPOSE:
To ensure the member has full understanding of why mileage reimbursement payment or transportation has been denied.

DEFINITIONS:
Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

Mileage Reimbursement: Refers to the monetary reimbursement issued to members that qualify for transportation but can provide it on his or her own behalf. There are several restrictions and requirements.

POLICY:
Policy 602 Denial of Payment or Services

RESPONSIBILITY:
For many plans, written notification must be provided to the member for denial of mileage reimbursement or transportation and include the reason for the denial. A member has the right to request and receive a detailed written notice of the denial of payment. Denials may occur even with claims where there is proof the trip occurred.

The Claims Department shall promptly send denial of payment/services letters as follows (see CLAIMS PROCESS MANUAL.docx for detailed instructions):

1. Denial letters are created daily by the Quality Management Department and automatically drop into the Denial Letters folder.

2. The Denial Letters Folder shall be checked the morning of each business day and all necessary letters will be printed.
3. The AS400 notes shall be updated for each member who receives a denial letter.
4. All denial letters shall be logged and saved electronically.
5. Denial letters shall be folded and placed into envelopes.
6. Each envelope shall be addressed and stamped with TR.
7. Envelopes shall be taken to the on-site mailbox.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Manager, Claims Date

Corporate Procedure

Subject:	Claims Web Application-Claim Approval Timeframe and Payment Schedule	**Procedure No.:**	605.001
Authorized By:	Manager, Claims	**Date:**	05/30/2013
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To make transportation providers aware of payment schedule and timeframe established by Accounting, and to ensure transportation providers are paid in a timely manner for trips claimed through the online Claims Web Application.

DEFINITIONS:
Transportation Providers: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population. They are also known as Clients.
Claims Web Application: The Claims Web Application is an online tool utilized by transportation providers and MTM to facilitate timely and accurate payment of services rendered.

POLICY:
Procedure 605.001 Claims Web Application-Claim Approval Timeframe and Payment Schedule

RESPONSIBILITY:
Transportation Providers shall be paid according to Accounting's established payment cycle as long as clean claims are submitted according to schedule.

The Claims Department will handle providers using the Claims Web Application as follows. (See CLAIMS PROCESS MANUAL.docx for detailed instructions.):

1. The Claims Specialist will be made aware of the payment schedule and claim approval timeframe of any providers they are associated with.
2. Provider is responsible for submitting claims through the claims web application in accordance with the defined payment schedule.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Manager, Claims Date

Corporate Procedure

Subject:	Claims Web Application-Verification of Claims	**Procedure No.:**	606.001
Authorized By:	Manager, Claims	**Date:**	05/30/2013
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To define the method in which Transportation Providers claims will be verified via the Claims Web Application.

DEFINITIONS:
Transportation Providers: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population. They are also known as Clients.
Claims Web Application: The Claims Web Application is an online tool utilized by transportation providers and MTM to facilitate timely and accurate payment of services rendered.

POLICY:
Policy 606 Claims Web Application-Trip Submissions and Claims

RESPONSIBILITY:
Transportation providers will be given the ability to claim trips within their contractually specified timeframes with supporting signature documentation via MTM's online claims application.
The Claims Department will handle verification of claims uploaded by providers using the Claims Web Application as follows. (See CLAIMS PROCESS MANUAL.docx for detailed instructions.):

1. Claims uploaded to the online Claims Web Application must be verified before the packet validation deadline defined on the Claims Packet page.
2. The Signature Entry Team will verify packets in accordance with specific plan/contract/provider requirements as follows:
    - Select a packet to verify by clicking the packet link.
    - Open the attachment.
    - Locate the signature for each trip number listed.

- Enter the signature verification status for each trip:
    - **A** – If the signature is acceptable
    - **S** – If the signature is not found
    - **T** – If the trip number is not found
    - **R** – If the trip is rejected for any other reason (initials, X's, stamps, etc.)

3. Submit the packet as verified.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Manager, Claims Date

Corporate Procedure

Subject:	Claims Web Application-Verification of Drivers and Vehicles	**Procedure No.:**	607.001
Authorized By:	Manager, Claims	**Date:**	05/30/2013
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To ensure that Transportation providers only use approved drivers and vehicles for transporting members and filing claims for payment via MTM's Claims Web Application.

DEFINITIONS:
Transportation Providers: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population. They are also known as Clients.
Claims Web Application: The Claims Web Application is an online tool utilized by transportation providers and MTM to facilitate timely and accurate payment of services rendered.

POLICY:
Policy 607 Claims Web Application-Approved Drivers and Vehicles

RESPONSIBILITY:
In order for Transportation providers to claim for payment and to be paid by MTM, they must use only pre-approved credentialed drivers and vehicles for all claims they submit for payment via the Claims Web Application.

The Claims Department will handle verification of drivers and vehicles for claims uploaded on the Claims Web Application as follows. (See CLAIMS PROCESS MANUAL.docx for detailed instructions.):

1. The Claims Web Application automatically checks the validity of all drivers and vehicles; however, sometimes the claimed driver and/or vehicle do not match the driver and/or vehicle on the trip log.

2. The Verification Specialists will perform driver and vehicle verification for 1% of packets entered. The packets to be verified should be selected randomly.
3. After randomly selecting the packet for driver/vehicle verification, the Mast Provider List on the Recon Drive must be checked to ensure that the provider is contractually required to use only credentialed drivers/vehicles.
4. After entering an approved (A) verification status for each trip, verify the driver and vehicle as follows:
    - Hover over the trip in question with the cursor.
    - A window will open indicating the driver, driver license number, and vehicle identification number (VIN).
    - Check the corresponding attached trip log to ensure the driver name, DL#, and VIN match what was claimed.
5. If all the information does not match what is claimed, un-submit the trip log and select the "Driver, Vehicle, or Pick up and Drop off time information is incomplete" option. An email will automatically be sent to the provider and their representatives.
6. If all the information does match what is claimed, submit the packet as verified.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

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Manager, Claims Date

Corporate Procedure

Subject:	Claims Web Application-Appeals	**Procedure No.:**	608.001
Authorized By:	Manager, Claims	**Date:**	05/30/2013
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To allow transportation providers using the Claims Web Application the opportunity to appeal disputed claims for payment.

DEFINITIONS:
Transportation Providers: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population. They are also known as Clients.
Claims Web Application: The Claims Web Application is an online tool utilized by transportation providers and MTM to facilitate timely and accurate payment of services rendered.

POLICY:
Policy 608 Claims Web Application-Appeal Process

RESPONSIBILITY:
MTM shall allow Transportation Providers the ability to dispute discrepancies on selected denials when the provider feels the denial of payment for the claim was in error.

The method Transportation Providers must use to dispute denied claims is outlined as follows:

1. The transportation provider will submit the appeal via the Claims Web Application within 30 days of denial and will supply the necessary information to support disputes.
2. The Reconciliation Specialist will log in to the Claims Web Application in order to review the submitted data within 30 days of the appeal and either:
    - Approve the appeal.
    - Determine insufficient documentation was presented and deny the appeal.
3. The specialist will navigate to the Appeal Detail page and review each dispute.

4. The response column will include the provider's reason for disputing the denial as well as any documentation to prove why the claim should be approved.
5. The specialist will address each dispute and update the appeal information via the Claims Web Application. There are multiple reasons a trip may be denied, each requiring a different action from the specialist.
6. In some cases, the denial will be due to an invalid driver or vehicle.
    - If the provider has contacted their Network Representative to update the driver/vehicle credentials, the specialist will be able to approve the claims.
    - If the provider has not contacted their Network Representative to update the driver/vehicle credentials, the specialist will not be able to approve the claims and should direct the provider to their Network Representative.
7. In some cases, the specialist may need to access and verify the provider's credentials via the Credentialing website.
8. After a dispute status has been selected for each disputed denial reason, the specialist can approve or deny the appeal.
    - Normally, the appeal would be denied if any dispute's status is denied, but there are rare circumstances that would require the specialist to approve the appeal even if one or more of the disputes were denied.
9. The transportation provider can escalate a denied appeal within 30 days of the denial as a means of a 2nd appeal and must supply supporting data and/or circumstances for 2nd appeal.
10. Another Claims Representatives will review submitted data and approve or deny 2nd level appeal. The same staff member cannot work both appeals.
11. Results of the 2nd appeal are final and no further appeals will be accepted.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

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Manager, Claims Date

Corporate Procedure

Subject:	Mileage Reimbursement Attendance Verification	**Procedure No.:**	610.001
Authorized By:	Manager, Claims	**Date:**	5/30/2013
Department:	Claims	**Last Revised:**	5/1/2014
Applicability:	Claims		

PURPOSE:
To ensure that the verification of mileage reimbursement requests are handled in a timely and consistent manner and followed up with confirmation on 10 – 20% of verified appointments.

DEFINITIONS:
Mileage Reimbursement: Refers to the monetary reimbursement issued to members that qualify for transportation but can provide it on his or her own behalf. There are several restrictions and requirements.

Member: Refers to the population served by MTM. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

POLICY:
Policy 610 Mileage Reimbursement Attendance Verification

RESPONSIBILITY:
Attendance verification shall be conducted on mileage reimbursement requests for the required plans through facility signature logs. 10 – 20% of facility signature logs will be additionally verified through verbal contact with the facility.

The Gas Mileage Reimbursement Team shall handle Mileage Reimbursement Attendance Verification as follows.

1. Attendance verification will be completed for all mileage reimbursement requests based on contract requirements.

2. Verification of the member's attendance to the appointment is established by the member sending in an official MTM trip log including a signature or stamp from the facility where the appointment took place.
3. The GMR Team will obtain trip logs via certified mail or fax and verify the facility signature.
4. A follow-up verification will be conducted randomly 10%-20% of all trip logs through verbal contact with the facility to confirm the attendance of the member.
5. The GMR Team will process the logs and document all relevant information in MTM's Net Management System (the AS400).
    a. AS400 notes should reflect information from the log and be noted as "TRIP LOG".
    b. Each individual trip may need to be noted with the type of attendance verification used depending on the member's plan guidelines.
6. Trip logs received via certified mail will be sent to the Claims Administrators for scanning and saving in accordance with Procedure 610.002 GMR Documentation Retention. Trip logs received via email and fax will be saved by the GMR staff members into the Public Outlook folder: Mileage Gas Reimbursement by year and month.
7. Reimbursement will be based on Net Management System's calculated trip mileage. The member's calculated mileage will not be used.
8. Mileage disputes will be reviewed by GMR through Google Maps, Map Quest, or other reliable on-line resources. If the member is not fully satisfied they have the option of filing an appeal with Quality Management.
9. Mileage Reimbursement Payments will be made personally to the member (unless stated otherwise on the log) twice monthly in accordance with the defined payment schedule, and payments will be made on a per vehicle basis only without regard to the number of riders.
10. GMR will be responsible for any required check traces and pulling trips in EG Status for member's using Money Gram Payments.
11. GMR staff will forward any check re-issuing requests to Accounting for investigation.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Manager, Claims Date

10.0 Information Technology

To bring about the effective management of large-scale contracts with complicated NEMT requirements, MTM developed our custom NET Management System. Built specifically for MTM's successful NEMT management model and combined with commercially available software, this system is an integrated suite of the most comprehensive, reliable software available in the industry. With this suite, MTM is able to seamlessly blend unique NEMT requirements with standard technological software to create a best-in-class system that automates virtually every aspect of transportation management. In short, it allows MTM to successfully manage the day-to-day operations of NEMT programs for the delivery of cost-efficient, appropriate services.

Our more than 18 years of experience managing NEMT services informed our system's programming, and continues to dictate changes made to the software. The configurable system automates the call intake and scheduling processes, provides secure information exchange of member eligibility files, and virtually eliminates the possibility of authorizing services to a non-covered service or medical provider. Our system is customized to meet DHCFP's requirements, and we work with local stakeholders to continually update it based on the evolving needs of the program. Specifically, the NEMT Management System accommodates the services and functions outlined in the below table.

NET Management System Capabilities	
Function	**Description**
Provides Web Portals	DHCFP, local NEMT providers, medical providers, and members have access to independent web portals that provide a complete range of services and data based on the user's access rights
Accommodates Call Intake Processes	Facilitates call intake, including automatically loading member information when the CSR enters the member's name or ID number
Manages the LON Assessment	Initiates the LON assessment for new members, analyzes the data returned, determines the most appropriate mode of transportation, and manages renewals prior to the expiration date
Manages NET Requests	Provides a complete management solution for trip scheduling, including applying eligibility rules, determining the most appropriate and cost-effective mode of transportation, and ensuring the trip is to a covered service with an approved provider
Selects a NET Provider	Determines the most appropriate NEMT provider using an algorithm based upon the trip details and cost, as well as the provider's availability, quality ranking, and location

NET Management System Capabilities	
Function	**Description**
Notifies Providers of Assigned Trips	Uploads trip assignments to the NEMT provider's web portal, where the provider can easily download its manifest
Reimburses Members	Verifies that the member meets DHCFP's criteria for mileage reimbursement and determines the amount that should be applied to their debit card
Detects Fraud and Abuse	Applies proprietary data mining algorithms designed to detect fraud and abuse by comparing data supplied by NEMT providers to data obtained through other sources, including analysis of driver and vehicle utilization, attendance verification with medical providers, on-street observations, member-supplied information, and quality assurance audits
Creates Reports	Develops reports in DHCFP's approved format, delivers them via SFTP, and provides online reporting tools enabling DHCFP to request ad hoc data on an on-demand basis
Develops Encounter Files	Captures, stores, and creates DHCFP-compliant encounter files; electronically transmits the files in accordance with DHCFP regulations; and ensures the encounters reflect actual services with a 99% pass rate
Facilitates Member Communication	Creates letters customized for members for denied services or educational purposes
Stores Member and Trip Information	Serves as a repository for information linked to specific members and trips, including special needs, approved modes of transportation, and other special instructions
Interfaces with DHCFP	Exchanges information and data files with DHCFP in secure electronic format
Receives and Stores Member Extract Files	Interfaces with DHCFP to receive weekly eligibility files via secure, encrypted data connection, submits eligibility verification requests to DHCFP's Medicaid Management Information System (MMIS), allows MTM representatives to manually enter eligibility data as needed, and reconciles manually entered data against member extract files
Captures NEMT Data	Captures and retains data, including complaints and issues, to develop required reporting packages, ad hoc data, and other files requested by DHCFP
Pays NEMT Providers	Reconciles trip data, authorizes reimbursement, and develops an appropriate check

MTM's software is designed to be portable and scalable. Portability means that each application is platform independent and, unlike other systems, is not constrained to the technology that was in place when it was originally developed. Accordingly, MTM can take advantage of emerging technology with minimal impact to the existing system, benefiting from the opportunities, cost savings, and efficiencies that are continually presented to the industry. Scalability means that additional capacity may be added as required with minimal, if any, impact to infrastructure.

The combination of portability and scalability provides unlimited potential to increase volume and add new functionality and technology while maintaining system response times. This, combined with web-based access, means that an infinite number of users may access the system simultaneously with no degradation in performance. Thus, DHCFP will always be in a position to deliver innovative services to NEMT members without the restrictions and constraints associated with systems that are not web-based, platform independent, and scalable.

DHCFP Data Requirements

As required by DHCFP, each week MTM will upload the Member Extract File into our NEMT Management System within two business days of receipt. The NEMT Management System has the capability to also accept manually entered eligibility data and will reconcile the manually entered data against the Member Extract File to ensure data integrity. DHCFP will have access to MTM's NET Management System for auditing and monitoring purposes.

System Security

MTM takes member and program confidentiality seriously, and abides by DHCFP's policies regarding data security and integrity. We facilitate security through highly intuitive physical and logical security layers. Our system is hosted in a secure environment and was architected in accordance with a layered security model. Online access to the services and data provisioned by our system is provided via secure web portals. Within the secure environment of our NEMT Management System, MTM supports both package encryption and transmission encryption to perform electronic data exchange on a preset schedule. MTM supports any designated secure protocol, including but not limited to PGP encryption, SFTP, and FTPS.

Confidentiality of PHI is achieved by adherence to the privacy and security requirements of HIPAA. Security is achieved by ensuring that electronic data transfers are via SFTP or HTTP over SSL with128-bit encryption. Further, to ensure that access to data is limited to the information

required to perform the task at hand, only those individuals authenticated as authorized users are allowed access. Within each application, access to information is further limited via rule-based security. Industry-standard security practices are applied to ensure that logon credentials are secure.

Data is protected on several levels. Data is electronically secured using the industry standard layered security model illustrated and described below.

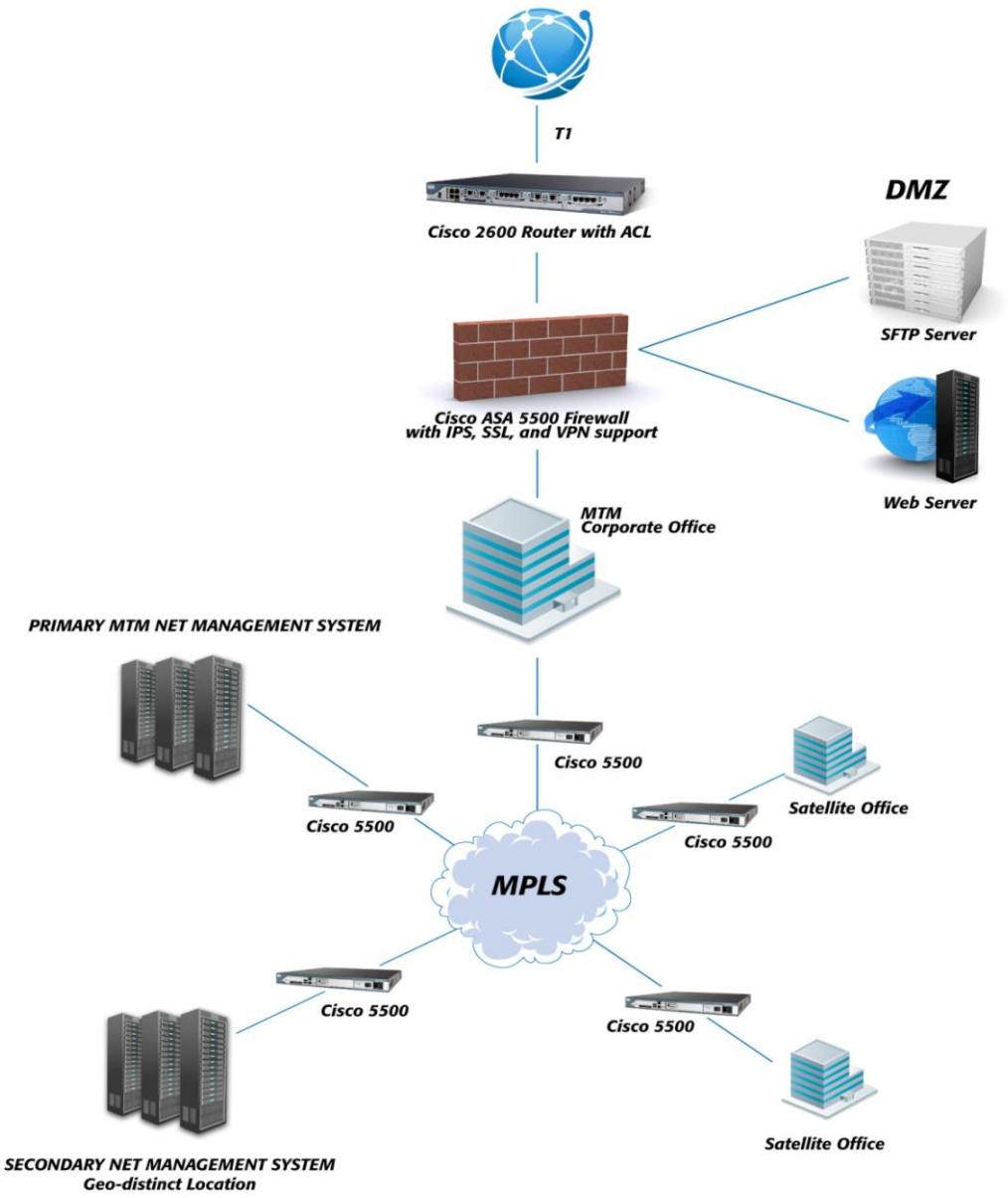


Figure 1: Security Layers. MTM provides a secure environment for data using industry best practices.

A Cisco 2600 router switches the Internet T1 connection to Ethernet and provides a front line of defense through Access Control Lists (ACLs) managing and directing network traffic based upon predefined network protocols and destinations. A Cisco ASA 5500 Adaptive Security Appliance provides a demilitarized zone (DMZ) and a world-class firewall securing the private MTM network from the threats inherent in the Internet. The SFTP and web servers are located within the DMZ providing further protection from hostile Internet threats. Within each layer Sophos Endpoint Security and Data Protection provide anti-virus, anti-malware, anti-spyware firewall, Network Admission Control (NAC), and Data Loss Protection (DLP).

A digital camera system monitors the interior and exterior of the premises used to house the NEMT Management System. Keyless entry is used to secure entry into the general office. Non-employees are required to show ID, sign in, and document their reason for entry. Non-employees are escorted the entire time they are in the office. The premises are also protected by a remotely monitored security alarm system. Within the premises, the NEMT Management System is located in a secure computer room accessible only by proximity cards and pass codes. Remote access to all computers and equipment in the computer room is controlled by login and a secure password. All work areas are located in secure areas not accessible to the public, and work-related documents are returned to locked storage at the end of use. All employees are required to attend security training and sign confidentiality statements. Internal users are fully trained in HIPAA use and disclosure regulations, and external users are required to sign a Business Associate agreement confirming compliance with HIPAA use and disclosure regulations.

Secure Web Portals for Online Features

Unique to the industry, four independent web portals deliver access to a complete range of NEMT services and data. Each portal provides an intuitive interface independently designed to meet the specific needs of the four major stakeholders: DHCFP, local NET providers, local medical providers, and members. MTM ensures that our web portal system conforms to all of DHCFP's security requirements, including that screens within each of these portals conform to the requirements of readability set forth by ADA.

DHCFP Portal

The DHCFP portal provides the online ability to:

- Schedule, review, and change transportation arrangements.
- View and download standard and customized reports.
- View complaint resolution and tracking data.
- View NET provider data.
- Have read-only access into MTM's system.

DHCFP can schedule, review, and research NEMT arrangements for all current members and those previously submitted to MTM on the member file. Scheduling and changes are subject to eligibility on the date of transport and the requirement to utilize the most appropriate, cost effective mode consistent with the member's needs. An intuitive interface guides staff through these processes, explaining situations that may result in transportation being denied, or authorized transportation differing from that requested. Staff is provided guidance on how to manage exceptional situations. **Figure 2** illustrates how the system will present detailed NET arrangements to DHCFP.

MTM

LOGIN
Logged In: Michael Ayers
Log Out Main Menu Edit

Member Search | Review Trip | Schedule Trip | Change Trip | Cancel Trip | Help

Trip Number: ABCA1234567

Member Information

Medical ID Number: 0123456789
Full Name: John Doe
Date Of Birth: 02/25/1984

Date and Time / Trip Reason

Trip Reason: Discharge
Trip Type: One Way
Appointment Date: 03/01/2009
Appointment Time: 1:15 PM
Return Time: N/A

Date and Time / Trip Reason

Pick-Up Name: Test Facility
Pick-Up Address: 16 Hawk Ridge Dr
Pick-Up City, State, Zip: Lake St. Louis, MO 63367

Drop-Off Name: John Doe
Drop-Off Address: 1 Test Ave Apt 15
Drop-Off City, State, Zip: Lake St. Louis, MO 63367

Additional Passengers

Name:	Age:	Needs Carseat Provided:	Sex:	Relationship:	Has Appointment:	Medical ID Number:
Jane Doe	25	No	F	Spouse	No	N/A
Jim Doe	2	Yes	M	Child	Yes	1234567890

Special Needs

Contact Phone Number: (555) 555-5555
Needs Carseat Provided: No
Member Pregnant: No
Crutches / Walker / Cane: No
Wheelchair Lift Required: No

Transportation Provider

Vehicle Type: Ambulatory (ie: cab, sedan, or van)
Transportation Provider: Best Guess Transportation (111) 111-1111

Cancel Trip | Back | Print Trip

Terms of Use MTM Site

GODADDY.COM VERIFIED & SECURED

For assistance, please contact the Transportation Provider Help Desk at (877) 892-3997 Monday – Friday from 6:00AM – 7:00 PM CST.

Figure 2: DHCFP Web Portal Screenshot. The sample screenshot above is what DHCFP sees when reviewing a specific trip.

Access to online reports is in addition to delivery via SFTP. Standard and customized reports may be viewed and/or downloaded in Microsoft Excel format. Reports are also stored online by MTM for a limited period of time, and may be customized by date range, vehicle type, NEMT provider, member, tracking numbers, and other criteria. This is illustrated in **Figure 3**.

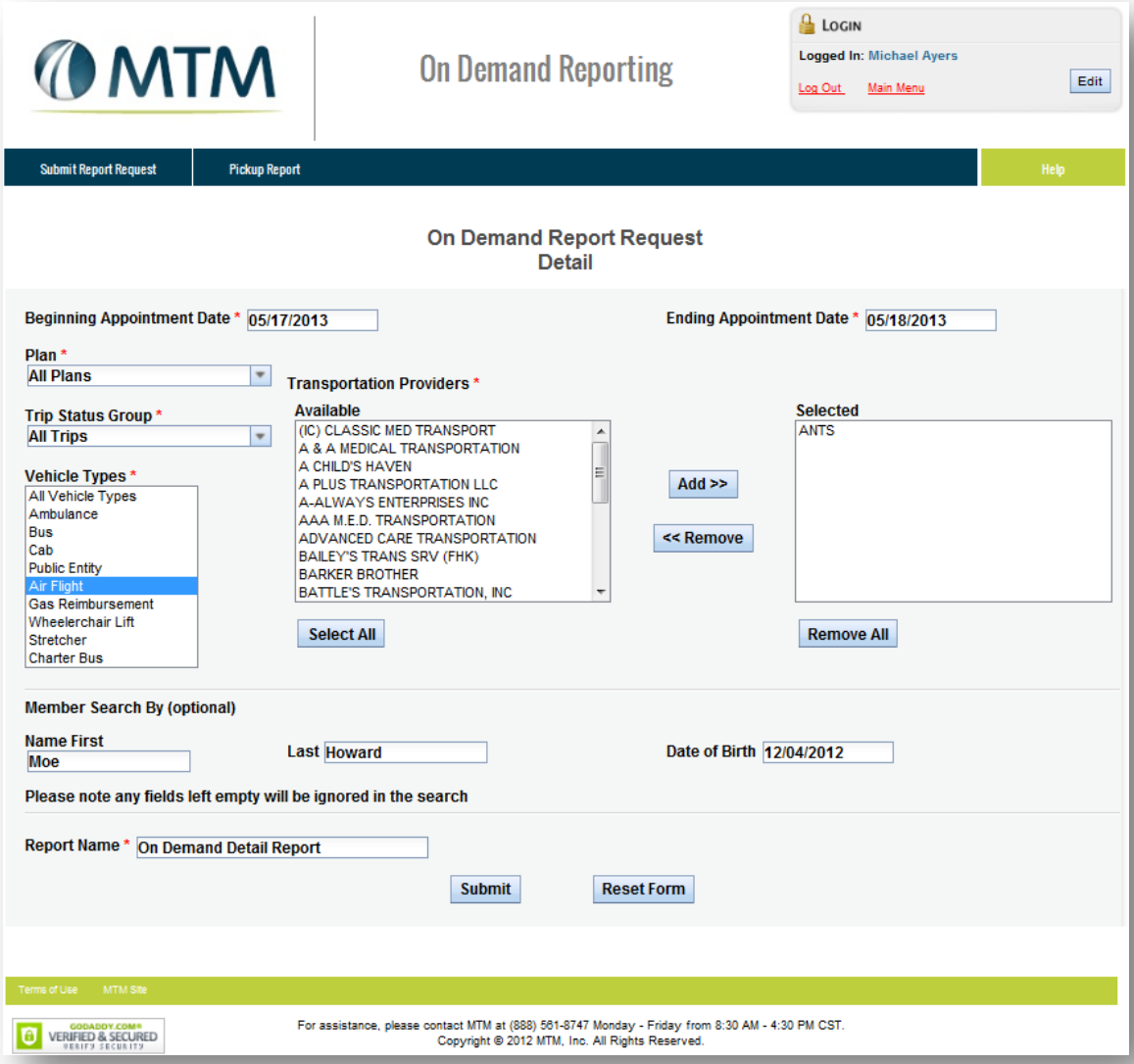


Figure 3: On-Demand Report Screen. DHCFP can create custom reports showing real-time data.

DHCFP staff can also view summary complaint data for the program as a whole, or by member, and drill down into the details of each complaint and associated resolution. DHCFP staff can also be assigned the authority to enter complaints if requested.

Figure 4 illustrates how individual complaints can be entered for a specific member, and how the complaint history associated with that member is presented.

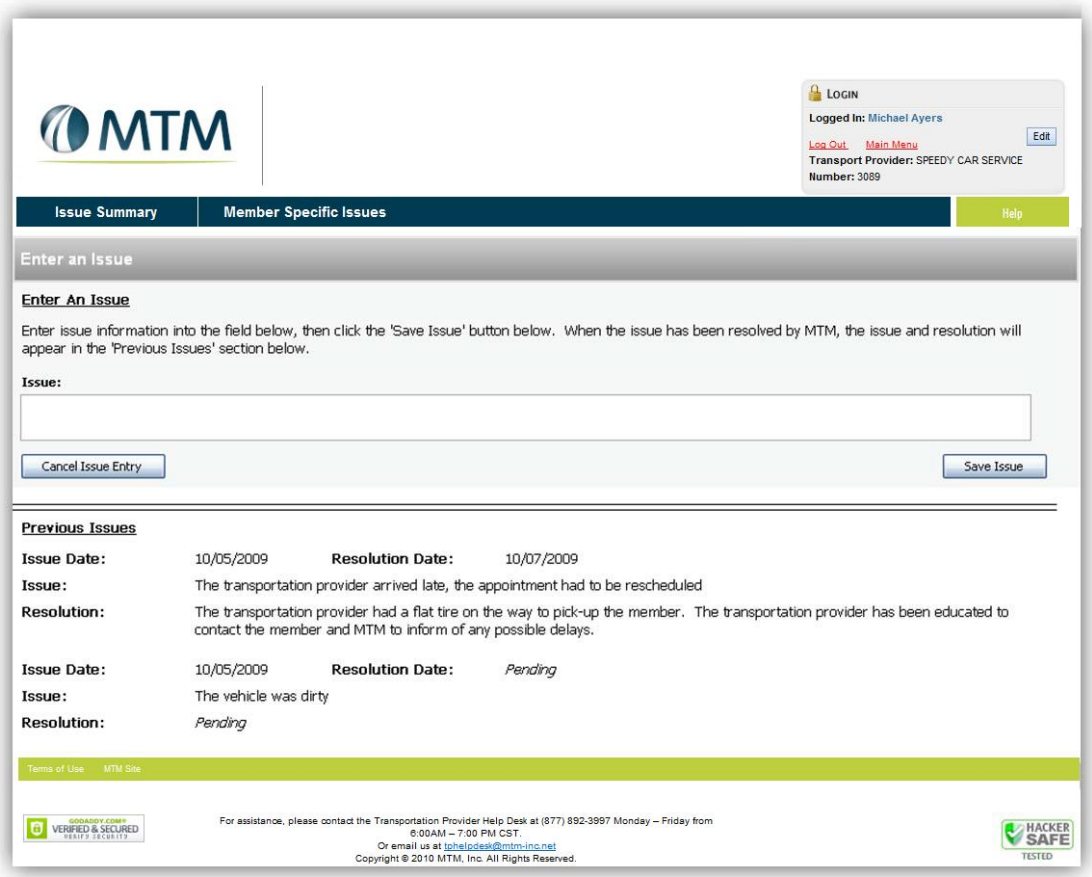


Figure 4: Manual Complaint Entry Screen. Complaints and resolutions can be entered and tracked online.

DHCFP staff have read-only access to NET provider data. This includes the ability to view business, driver, and vehicle credentials; pick-up and drop-off information; and claims data. **Figure 5** illustrates how driver credentialing information is presented to DHCFP staff.

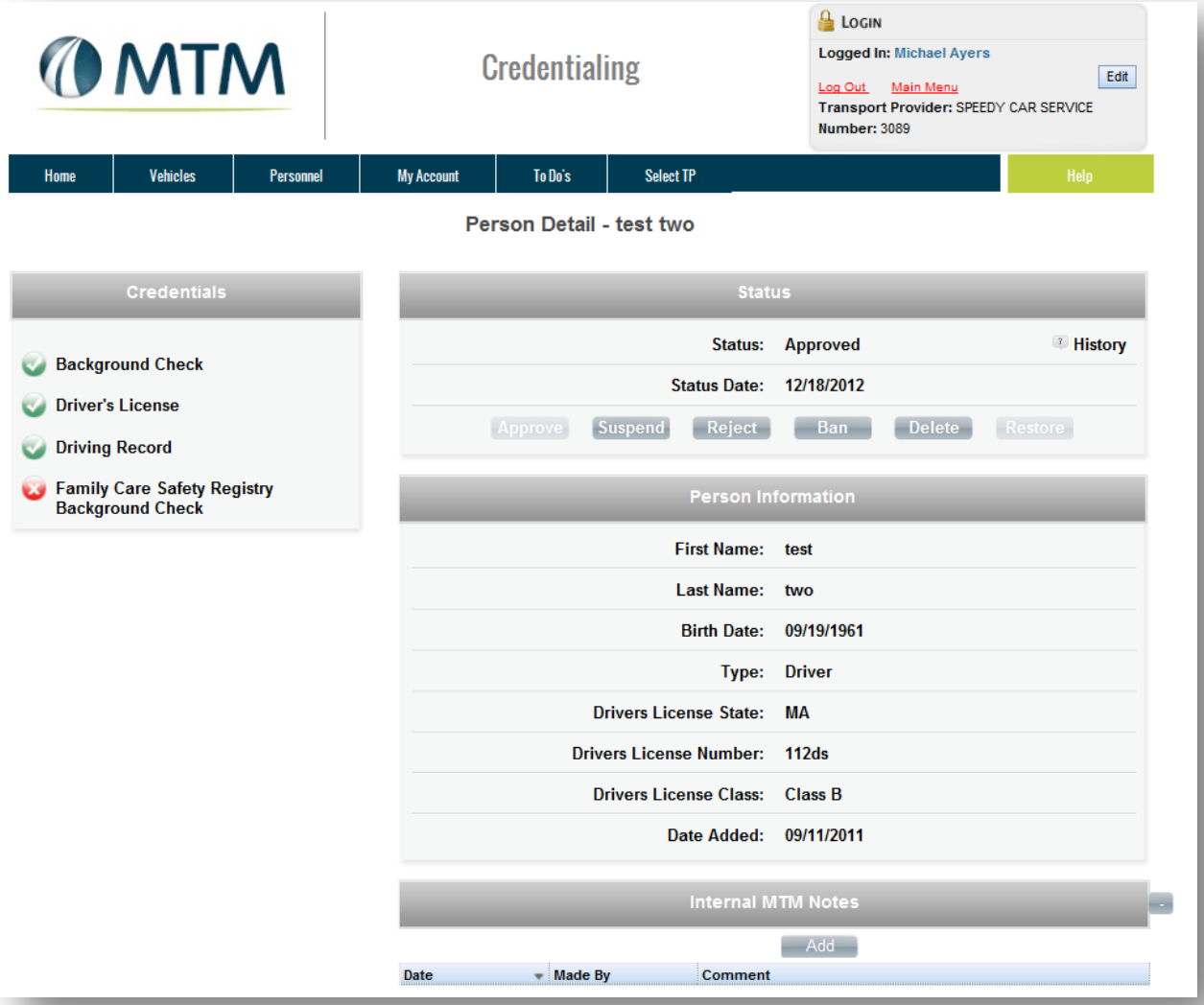


Figure 5: Driver Credential Detail Screen. DHCFP can view driver and NEMT provider credentials in a read-only format to monitor compliance.

In summary, the DHCFP portal provides full transparency of our NEMT operations, facilitating independent remote access for auditing and monitoring purposes.

NEMT Provider Portal

The NEMT provider portal gives providers the online ability to:

- Electronically view and download assigned trips through a customized download format.
- Update, accept, and decline trips.
- Mark trips as no-shows.
- View report card data.
- Manage credentials.
- Update service parameters and business information.
- Submit claims and enter pick-up and drop-off information, vehicle/driver details.

NEMT providers can download assigned trips in Microsoft Excel format. This format is supported by the import feature of all commercially available demand response scheduling and dispatch systems, including, but not limited to, products developed by RouteMatch, Trapeze, and StrataGen. It can also be used to manually manage trip information. In the event that a NEMT provider uses a proprietary system, it is likely that this format will be acceptable as is. If not, it can easily be converted into the format of choice.

Standard and customized reports may be viewed and/or downloaded in Microsoft Excel format, and may be customized by date range, vehicle type, and other criteria. In accordance with HIPAA regulations, the data available to NEMT providers will be restricted to that required to perform the services assigned to that NEMT provider. NEMT providers also claim trips online. Pick-up and drop-off times, vehicle identification numbers, and driver license data may be automatically uploaded in Microsoft Excel format, and/or manually entered via screens custom designed for efficient and accurate data entry. In both cases, immediate feedback on the validity of the information is provided.

Additionally, credentialing information is submitted, reviewed, and stored electronically. All interaction between the NEMT provider and MTM is online and/or via e-mail. NEMT providers start the process by entering credentialing data online and uploading digital images of the associated documentation. The portal supports industry standard file and image formats including, but not limited to, Microsoft Word, Microsoft Excel, Adobe PDF, JPEG, and GIF formats. Immediately after a credential is submitted, MTM staff is notified by e-mail of the need to review the credential. As soon as the credential has completed the review process, the results are

available online to providers. If a credential is not approved, detailed information and instruction on the next steps are provided online to assist the NEMT provider in completing the process. When all credentials are in order, the driver or vehicle is approved for use.

NEMT providers receive advance notice of any credential that is set to expire. The portal provides multiple notices of increasing severity, and if a credential is allowed to expire, the driver, vehicle, or company will be automatically removed as an approved entity. Each time the NEMT provider accesses the online system they are notified of all outstanding actions with due dates for completion. Detailed information on all credentials, drivers, attendants, and vehicles is available in formats that allow the NEMT provider to easily search and sort information. **Figure 6** illustrates how NEMT providers are presented with detailed information for their company.

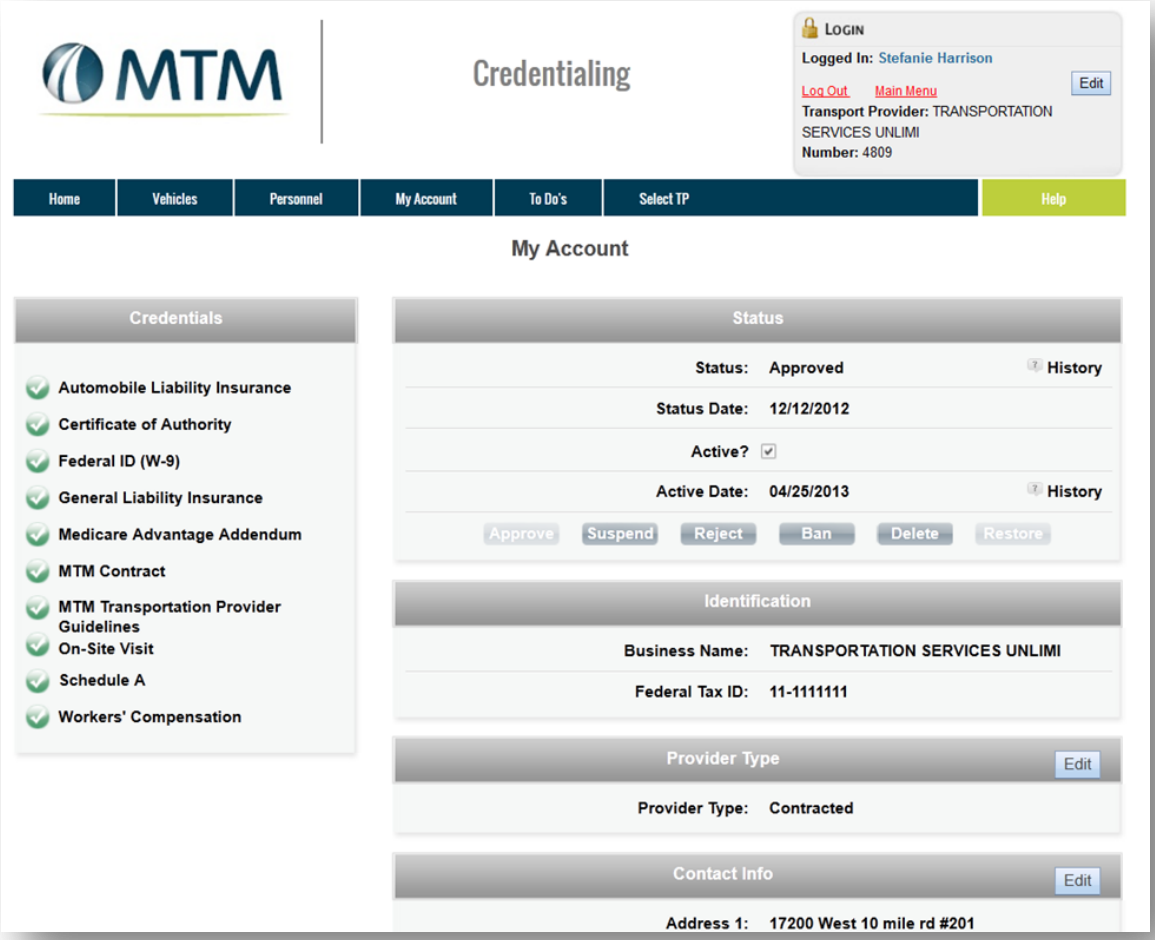


Figure 6: Credentialing Screen. NEMT providers can easily view the credentialing information of their drivers, update information, and identify any areas that are not in compliance.

NEMT providers also have the online ability to update their service parameters (hours of operation, service areas, and available vehicles, etc.) and business information (contact information, disadvantaged business certifications, etc.) online.

Sample screen shots that NEMT providers could access for Summary of Trips for a Date Range, Summary of Trips by a Member for a Date Range, and Details of Trips by Request Tracking Number are shown in **Figures 7, 8,** and **9** below.

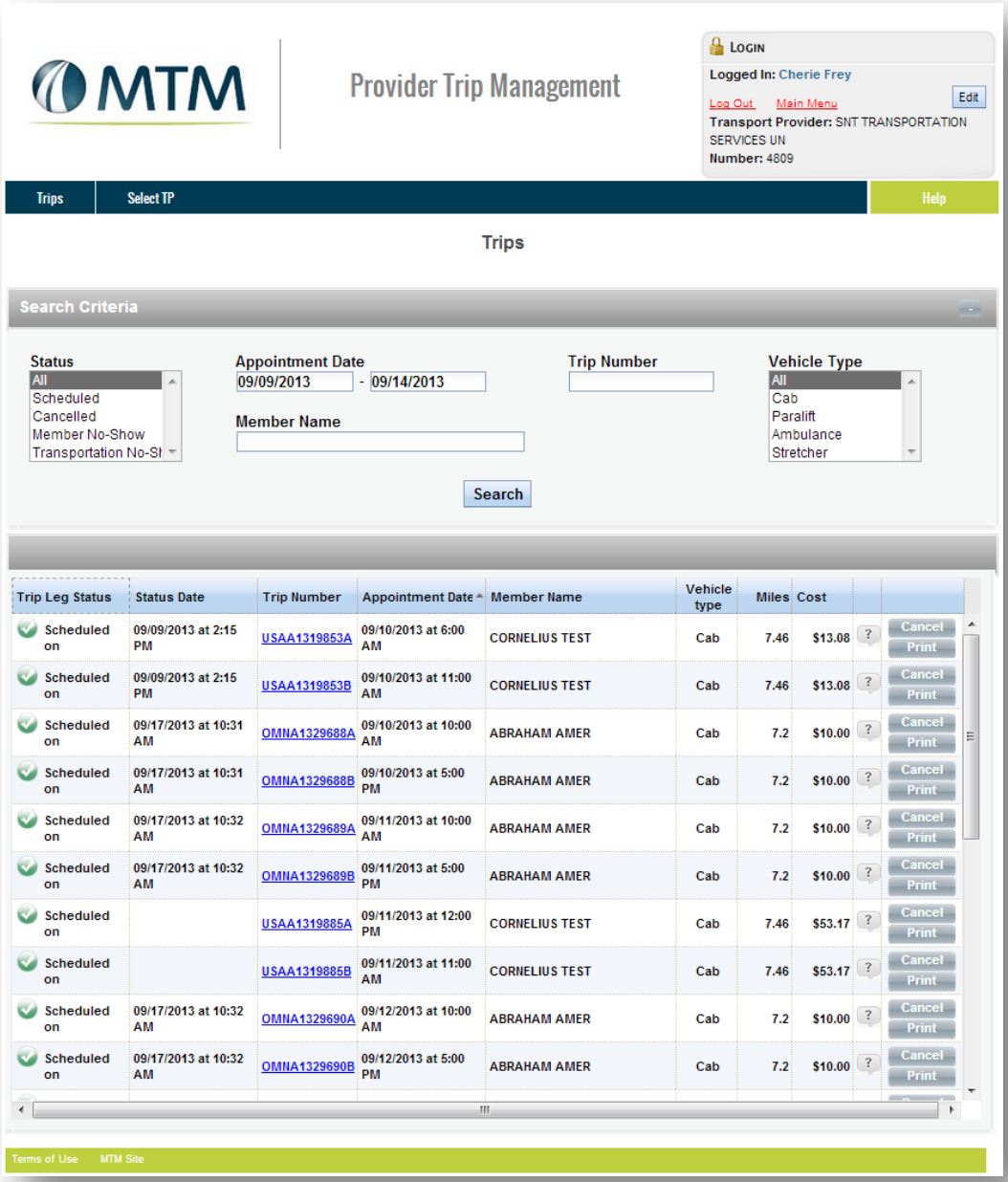
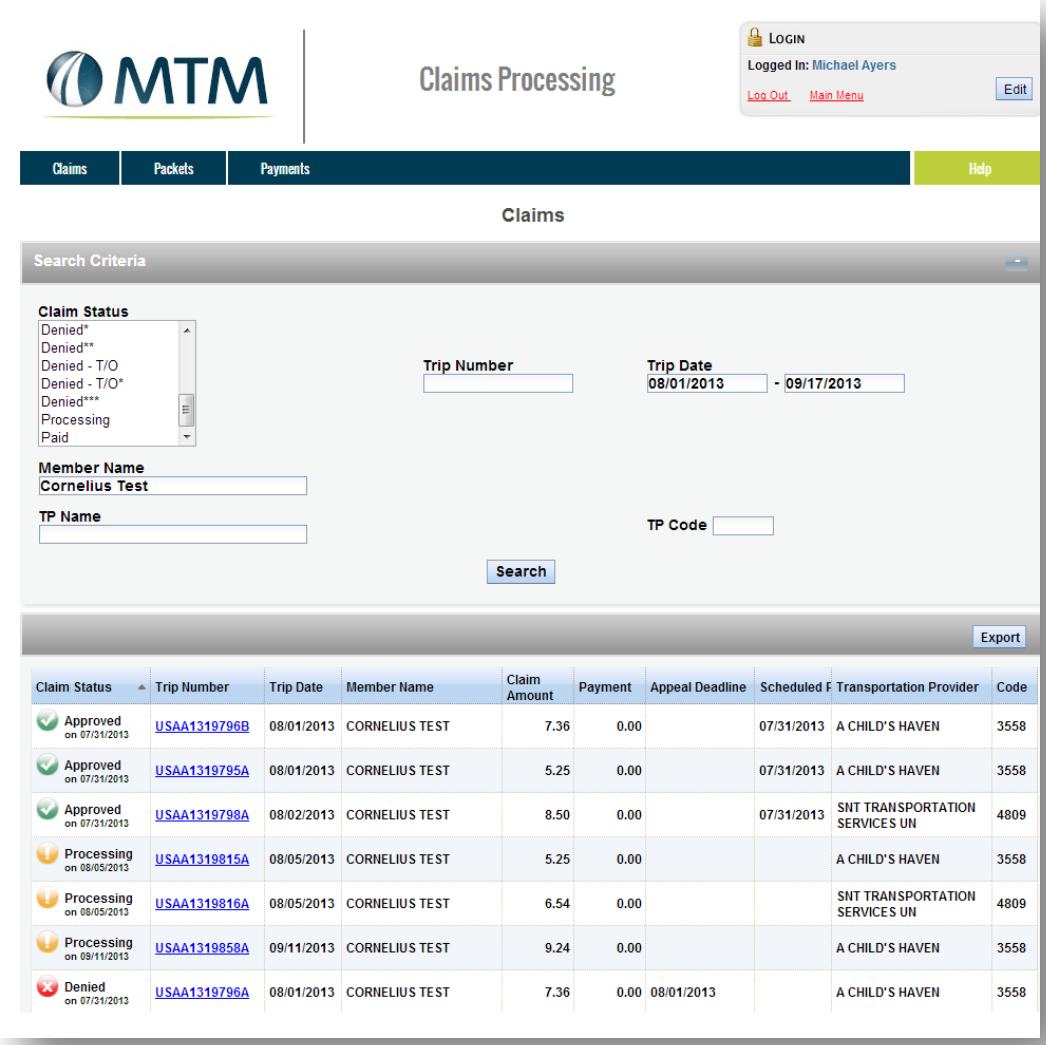


Figure 7: Summary of Trips for a Date Range.



Claim Status	Trip Number	Trip Date	Member Name	Claim Amount	Payment	Appeal Deadline	Scheduled P	Transportation Provider	Code
Approved on 07/31/2013	USAA1319796B	08/01/2013	CORNELIUS TEST	7.36	0.00		07/31/2013	A CHILD'S HAVEN	3558
Approved on 07/31/2013	USAA1319795A	08/01/2013	CORNELIUS TEST	5.25	0.00		07/31/2013	A CHILD'S HAVEN	3558
Approved on 07/31/2013	USAA1319798A	08/02/2013	CORNELIUS TEST	8.50	0.00		07/31/2013	SNT TRANSPORTATION SERVICES UN	4809
Processing on 08/05/2013	USAA1319815A	08/05/2013	CORNELIUS TEST	5.25	0.00			A CHILD'S HAVEN	3558
Processing on 08/05/2013	USAA1319816A	08/05/2013	CORNELIUS TEST	6.54	0.00			SNT TRANSPORTATION SERVICES UN	4809
Processing on 09/11/2013	USAA1319858A	09/11/2013	CORNELIUS TEST	9.24	0.00			A CHILD'S HAVEN	3558
Denied on 07/31/2013	USAA1319796A	08/01/2013	CORNELIUS TEST	7.36	0.00	08/01/2013		A CHILD'S HAVEN	3558

Figure 8: Summary of Trips by a Member for a Date Range.

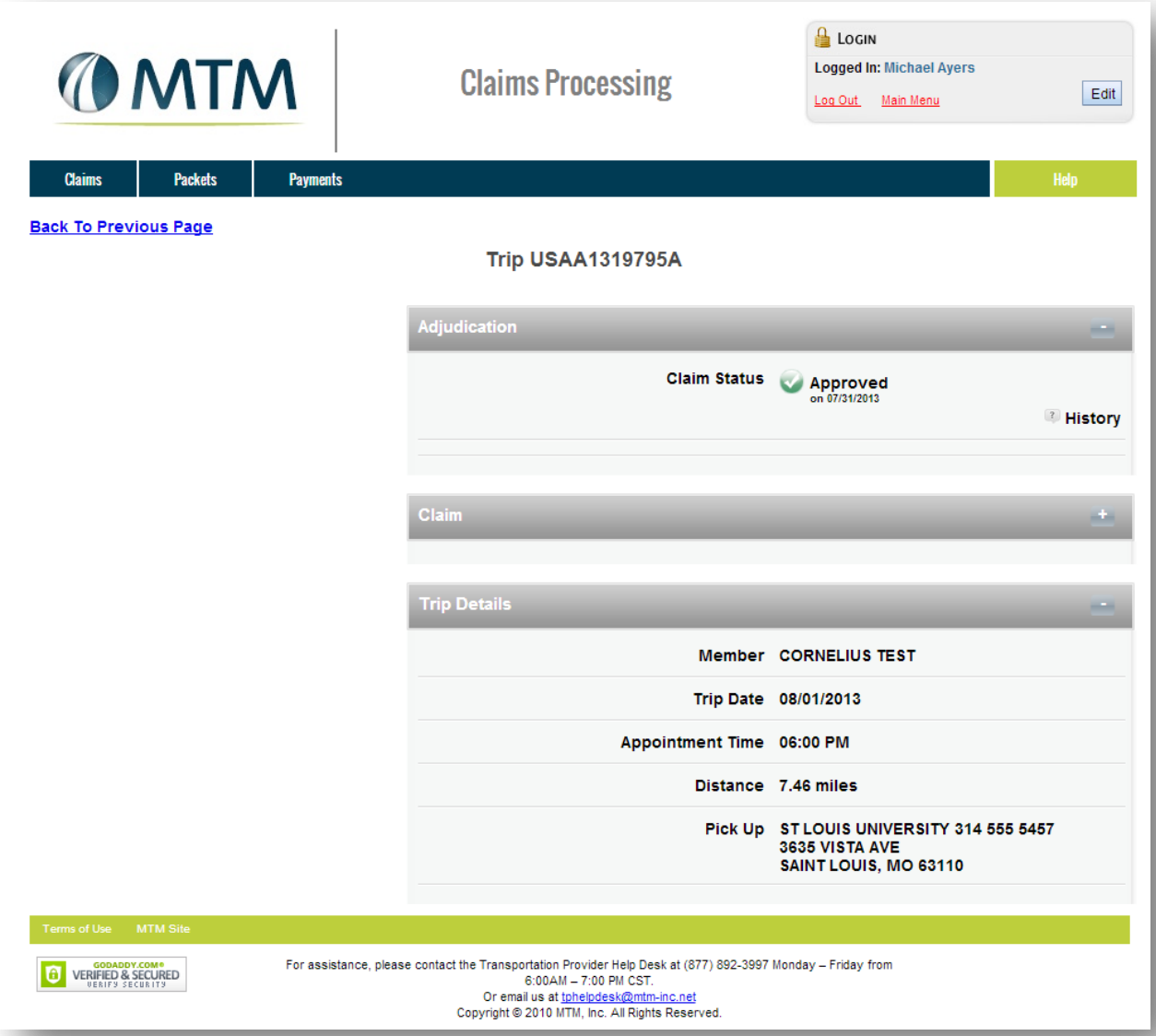


Figure 9: Details of Trips by Request Tracking Number.

In summary, this portal provides NEMT providers the ability to go paperless and seamlessly integrate the business applications of their choice with the NEMT Management System. The NEMT provider also benefits from streamlined processes provisioning rapid credentialing of drivers and vehicles, automated management of expiration dates, and cost savings associated with maintaining credentialing data online. NEMT providers appreciate the benefit of being able to expedite the billing process by submitting data online and viewing the status of payments in real time. This means DHCFP is assured of having a compliant network of credentialed drivers and vehicles.

Medical Provider Portal

The medical provider portal provides the online ability to:

- Schedule, review, and change transportation arrangements.
- Present the member with a user-friendly hard copy record of the transportation details.

In accordance with HIPAA regulations, medical providers are able to review and research the transportation arrangements that are associated with attendance at their facilities only. Otherwise, medical providers have the same ability to schedule, review, and change transportation arrangements as DHCFP staff.

Figure 10 is a sample of the screens that Nevada medical facilities use to schedule transportation arrangements.

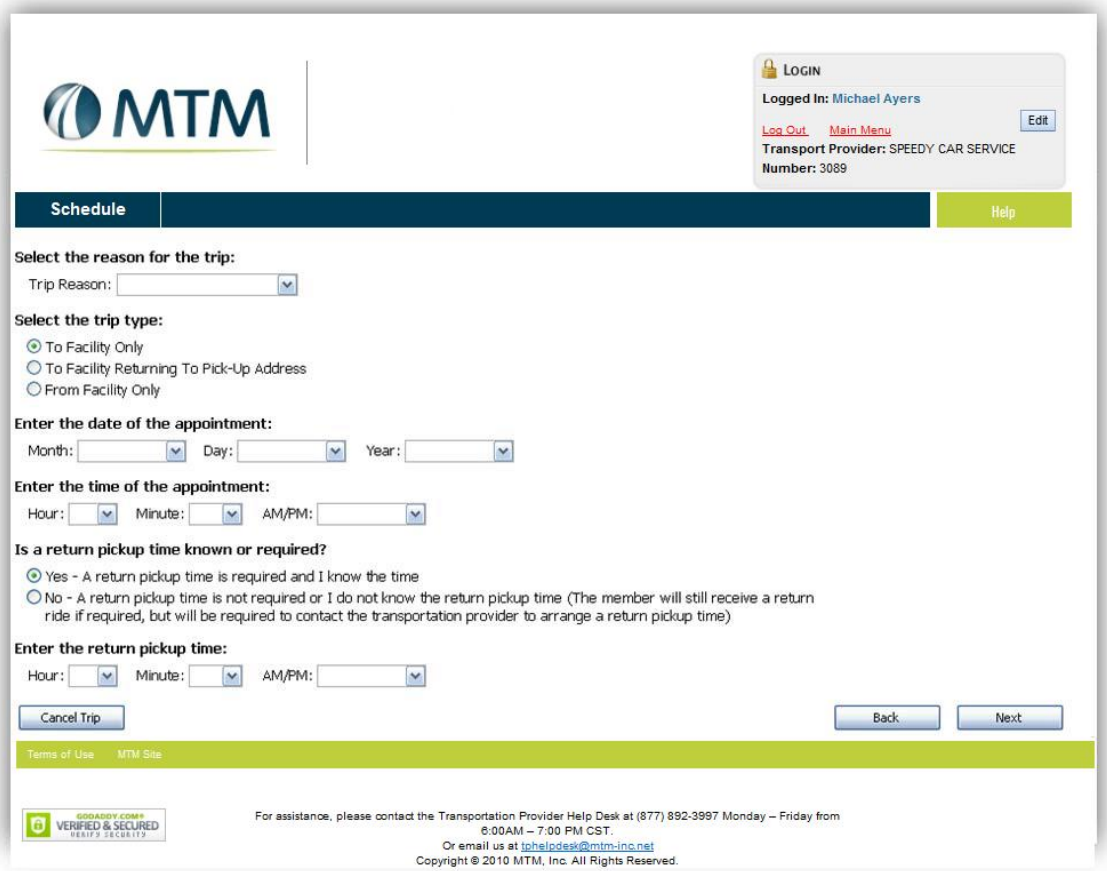


Figure 10: Online Trip Scheduling Screen. Medical providers can schedule trips conveniently online, facilitated by easy-to-use dropdown boxes.

In summary, this portal provides medical providers with the assurance that appropriate transportation arrangements are in place, thus ensuring that the member has appropriate access to the care required and eliminating the inefficiencies caused by missed appointments.

Member Portal

MTM can also provide members access to a portal that allows them to schedule, view, and modify trips online.

Information Technology Policies and Procedures

Policy 301	Computer Hardware and Software
Policy 302	Telecommuting Policy
Policy 303	Electronic Records Management and Destruction
Policy 304	Risk Assessment
Policy 305	Data Confidentiality and Security
Policy 306	Disaster Recovery
Policy 307	Data Integrity
Policy 308	Software Compliance
Policy 309	Encryption Policy
Policy 310	Infrastructure Systems Hardening
Policy 311	Adding or Changing User Access
Policy 312	Encounter Transmissions
Policy 321	Acceptable Use of Computer Equipment
Policy 326	Electronic Communications
Policy 333	Electronic Passwords
Policy 334	Software Development Lifecycle
Policy 335	Data Classification
Policy 336	Pandemic Preparedness
Policy 337	Change Controls and Tracking
Policy 338	Patch Management
Procedure 300.002	Pandemic Preparedness
Procedure 300.003	Security Badge Assignment and Proper Use
Procedure 312.001	Encounter Transmissions

Corporate Policy

Subject:	Computer Hardware and Software	**Policy No.:**	301
Authorized By:	President/CEO	**Date:**	4/26/2011
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
The purpose is to establish a policy for the purchase, installation, and use of computer hardware and software and provide safeguards against software copyright infringement. This policy applies to all MTM departments and affiliated companies.

POLICY:
All employees are responsible for following the policy and all technology purchases for hardware/software will be completed through the Information Technology (IT) Department. IT will be responsible for the purchase, installation, and support of all networked computer systems including hardware/software peripherals associated.

Company software purchased shall be available only to the maximum number of operators as specified by the license. Under no circumstances is an employee allowed to utilize an application from which he/she does not have a valid license and/or approval from IT. Only IT is permitted to install hardware/software.

The use of any unlicensed software on any company/private owned computer that attaches to the company network physically, by telecommuting and/or from any other remote location such as your home is strictly forbidden. The use of any personally owned software installed on any company owned computer is strictly forbidden.

RESPONSIBILITY:
Hardware/Software Acquisitions and Installations:
All hardware/software purchases will be centralized and purchased through IT. IT will coordinate the acquisition and installation of approved software to all employees when requested with proper approval from either the IT Director and/or CIO. Upon receipt of purchased hardware/software IT will facilitate installation.

Federal Copyright Law:
The rights granted to the owner of a copyright are clearly stated in the Federal Copyright Act, Title 17 of the U.S. Code. Software is automatically protected by federal copyright law from the moment of its creation. Persons who purchase a copy of software have no right to make additional copies without the permission of the copyright owner, except for the rights to (1) copy the software onto a single computer and (2) to make "another copy for archival purposes only."

The Federal Copyright Act provides for civil and criminal penalties for the infringement of copyrights. Individuals who copy are liable for the resulting copyright infringement whether or not they know their conduct violated federal law. The unauthorized duplication of software is also a Federal crime if done, "willfully and for purposes of commercial advantage or private financial gain."

Software Policy Components:
All employees shall comply with all provisions of the Federal Copyright Act and to ensure compliance.

IT is responsible to maintain a software inventory including related documentation to ensure that MTM is in compliance with the Federal Copyright Act.

Internal controls will be enforced through periodic audits to prevent the use of unauthorized software, including measures to verify compliance with these standards.

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Information Technology	Date
_____	_____
Chief Information Officer	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Telecommuting Policy	**Policy No.:**	302
Authorized By:	President/CEO	**Date:**	11/1/2009
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
This policy addresses the use of telecommunications and computer technologies to allow MTM employees to regularly perform some or all of their assigned duties at a location other than the employee's usual office work site during assigned work hours. The telecommuting work site is normally the employee's home.

This policy applies to all MTM employees, including regular, temporary, and contract employees.

POLICY:
The employee's supervisor must approve telecommuting and schedules.

Eligible Positions
Telecommuting is not a universal employee benefit. It is not available for every job or every employee at MTM. Some job positions are more suitable for telecommuting than others. Jobs that do not require face-to-face interaction, require minimal supervision, and involve the extensive use of computers and/or telephones are more appropriate for a telecommuting.

Work Schedule
If the needs of MTM on a particular day conflict with a telecommuter's approved telecommuting schedule for reasons such as the employee's need to attend meetings, training, or other work related activities, the needs of MTM shall take precedence over the schedule. If it is impossible or impractical for a telecommuter to work at home on a particular day due to family circumstances, equipment malfunction, or other reason, the telecommuter shall report to work at the usual work site. Whenever working at home or other telecommuting location, employees must remain accessible by phone and/or e-mail.

Leaves, Compensatory Time
Telecommuters are subject to all State and (Company) policies and procedures regarding leave and compensatory time usage and accrual.

Work Environment
The telecommuter shall designate a separate and distinct telecommuting work site within his/her home for the performance of his/her assigned duties. Such designated work site within the telecommuter's home, which shall be considered an extension of the employee's usual work site for Workers Compensation purposes, shall be maintained by the telecommuter so as to be safe, professional, and secure. Except in emergency situations, telecommuters shall not invite third parties into their homes for purposes of conducting MTM business. Such meetings shall ordinarily take place in the usual office work site and not the homework site.

Equipment, Supplies, and Telephone/Data Connection
Telecommuters may use State equipment and supplies to facilitate the performance of their assigned duties while at home to include laptop computers, cell phones, pens, file folders, and other miscellaneous office supplies. Such equipment and supplies, however, shall be used only for (Company) business. Personal use of State equipment and supplies is prohibited. Telecommuters shall supply, at their own personal expense, any other equipment, supplies, or property that they may choose to use in the performance of their jobs while at home, including, but not limited to, office furniture, personal phones, electrical fixtures, telephone/data connections, fax machines, desktop computers, and printers. To avoid the possibility of importing potentially harmful computer viruses into the (Company) network, telecommuters shall access the (Company) network only through State owned laptop computers.

Security
The telecommuter shall protect and safeguard files, documents, equipment, and other materials transported from the usual work site to the telecommuting work site. The telecommuter shall protect MTM records and documents from unauthorized disclosure or damage and shall comply with MTM network policies and procedures regarding such matters. Telecommuters using MTM provided software will adhere to the manufacturer's licensing agreements, including the prohibition against unauthorized duplication. To protect confidentially and guard against data contamination, telecommuters will follow MTM's approved data security procedures.

Telecommuting Expenses
While MTM may provide the telecommuter with equipment and supplies to assist the employee in the performance of his/her job at the telecommuting work site, MTM shall not assume responsibility for other costs associated with telecommuting, including, but not limited

to, remodeling; utilities; phone service charges, including long distance, related to employee's personal phone; home maintenance, and homeowner's insurance. In addition, telecommuters shall not receive any reimbursement of expenses for travel to the employee's headquarters from home and from home to the employee's headquarters.

RESPONSIBILITY:
The telecommuter is responsible for maintaining availability, appropriate levels of production, and quality of work while telecommuting. Specific tasks, timelines, performance measures and deliverables should be clearly identified before a work schedule that includes telecommuting is begun.

Termination of Telecommuting Agreement/Schedule
At any time after a telecommuting schedule has been approved and implemented, a telecommuter, upon reasonable notice to his/her supervisor, may abandon the telecommuting schedule and return to work at the usual work site. Likewise, MTM may modify or terminate a telecommuting agreement at any time, with or without cause, upon reasonable notice to the employee.

Employee
Discuss the possibility of telecommuting with your supervisor.

Supervisor
Signs off for a telecommuting schedule and keeps a copy of the request and approval in writing as necessary for documentation.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Information Technology	Date
_____	_____
Chief Information Officer	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Electronic Records Management and Destruction	**Policy No.:**	303
Authorized By:	President/CEO	**Date:**	11/1/2009
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
The purpose of this policy is to establish and document a system for the creation, use, maintenance and disposal of MTM and affiliated company's electronic records. It is MTM's policy to apply effective and cost efficient management techniques to maintain complete, accurate, and high quality electronic records. Records are maintained in accordance with all applicable laws, regulations, and MTM policies.

POLICY:
All MTM employees are responsible for ensuring that all electronic records are created, used, maintained, preserved, and destroyed in accordance with this policy.

RESPONSIBILITY:
An electronic record is defined as either a tangible object or digital information. This includes office documents, databases, application data, and e-mails.

Electronic records will be managed responsibly. Retention schedules, destruction procedures and methods will maintained for electronic records. Electronic records that have satisfied their required period of retention will be destroyed in an appropriate manner as defined by MTM policies. Electronic records containing confidential and proprietary information will be securely maintained, controlled and protected to prevent unauthorized access.

All electronic records will be maintained and retained in accordance with Federal and state laws and regulations. The Compliance Officer will oversee the development of subsequent retention schedules. In addition, the Compliance Officer will review the appropriateness of these retention schedules periodically and recommend modification as necessary.

Electronic records containing confidential and proprietary information will be securely maintained, controlled and protected to prevent unauthorized access throughout the destruction process.

Destruction of protected health information (PHI) by MTM and affiliated companies shall be carried out in accordance with federal and state law and pursuant to a proper written retention schedule and destruction policy.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Information Technology	Date
_____	_____
Chief Information Officer	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Risk Assessment	**Policy No.:**	304
Authorized By:	Chief Information Officer	**Date:**	12/5/2012
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
To empower MTM's information security manager or specialists to perform periodic information security risk assessments for the purpose of determining areas of vulnerability, and to initiate appropriate remediation guidance to both IT and application development teams. This policy applies to all Medical Transportation Management, Inc. (MTM) employees and contractors.

POLICY:
The execution, development and implementation of remediation programs are the joint responsibility of the information security position and the departments responsible for the systems being assessed. Employees are expected to cooperate fully with any risk assessments being conducted on systems for which they are held accountable. Employees are further expected to work with MTM's information security personnel in the development of a remediation plan as deemed necessary for future risk assessments performed in a timely manner.

RESPONSIBILITY:
Risk assessments can be conducted on any MTM entity or any outside entity that has signed a Third Party Agreement and is connected to MTM's enterprise network. Risk assessments will be performed quarterly for both vulnerability and web applications and annually for penetration testing, wireless, physical and social engineering. These assessments can be conducted on any system, to include applications, servers, networks, and any process or procedure by which these systems are administered and/or maintained. Our risk assessment framework follows the industry standard guidelines as supplied by National Institute of Standards and Technology (NIST).

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Information Technology	Date
_____	_____
Chief Information Officer	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Data Confidentiality and Security	**Policy No.:**	305
Authorized By:	President/CEO	**Date:**	11/1/2009
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
The purpose of this policy is to ensure that access to all MTM operational data is limited to authorize staff; and to ensure protection from electronic threats.

POLICY:
The purpose of this policy is to inform MTM employees and contractors of their duty to protect and safeguard all confidential information acquired during the course of employment or service to MTM.

RESPONSIBILITY:
MTM operational data shall reside on secure servers and workstations. These computers operate and are monitored in a secure facility. Physical access to the facility shall be controlled through a proximity access card system. A backup server shall be maintained at the primary data center location. A secondary backup server shall be maintained at a second location. Maximum uptime shall be maintained through the use of an uninterruptible power supply (UPS), which includes electrical surge protection and a backup electrical generator.

Physical access to the servers and related devices shall be limited to a very small number of employees who need hands-on access to maintain the related equipment.

Software access to the production server shall be controlled through individual accounts. Accounts shall be secured through a system mandated-strong password. Accounts shall be immediately disabled upon employee termination. Access to individual desktop systems shall be controlled by similar account and password implementation.

The MTM network shall be separated from the Internet by network firewalls and network routers, which shall be continuously maintained and monitored. All systems shall have up-to-date anti-virus and malware detection software.

Access to the primary server from main office and satellite offices shall be available only through a multi-protocol label switching (MPLS) private network or similar tunneling protocol. Authorized MTM employees or contracts may connect through a secure virtual private network (VPN).

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Access to the primary server from main office and satellite offices shall be available only through a multi-protocol label switching (MPLS) private network or similar tunneling protocol. Authorized MTM employees or contracts may connect through a secure virtual private network (VPN).

Data provided by MTM to Clients, providers and facilities or from clients, providers and facilities shall be transmitted through HIPAA compliant means to safeguard confidentiality. The following means shall be utilized, depending on clients' data transmission policies:

- Secure electronic transmission: FTP over SSL/TLS (FTPS), SSH File Transfer Protocol (SFTP), HTTP with SSL encryption (HTTPS)

- FIPS 140-2 Validated File encryption
- A combination of transmission and package encryption
- Secure email also known as end-to-end email encryption. Secure email shall be utilized when emailing Protected Health Information (PHI) via email
- Phone calls and Facsimile. Resulting printouts or soft copy output shall be handled in a HIPAA compliant manner
- Mail/courier service – US mail and courier services shall provide confidential means for transmitting PHI

Key operational data shall be stored on networked data storage devices rather than on individual data storage devices. Access to key operational data shall be restricted to authorized users. All operational network data storage devices shall be backed up nightly and kept up to MTM retention policy standards.

Disaster recovery procedures shall be tested annually.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Information Technology	Date
_____	_____
Chief Information Officer	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Disaster Recovery (DR)	**Policy No.:**	306
Authorized By:	President/CEO	**Date:**	11/1/2009
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
MTM's policy is to maintain a viable recovery plan for each "business critical" information technology related service and operation. Planning for operations that may fall below the "business critical" level is encouraged but need not meet the same detailed planning and mandatory testing requirements. Plans are to provide for backup and supplementary replacement of information and equipment. MTM policy is to protect life, information and equipment in that order. Technology plans cannot replace the life or absence of employees but should be written for implementation by individuals who are not necessarily familiar with the regular operation. Annual testing is mandatory for all business critical functions.

POLICY:
MTM encourages the use of technology; yet recognizes that it is important to prevent misuse of computers, information, and processes and to mitigate business and operational risks associated with information. Departmental policies may be shared with MTM employees, business, clinics, affiliates, customers, partnerships, contractors and patients on a need to know basis.

RESPONSIBILITY:
Disaster Recovery Planning
Disaster recovery planning is the process of developing advance arrangements to enable response to disruptive events lasting an unacceptable period of time. The goal of the plan is to rapidly return critical information processing functions with minimal interruption or fundamental change. The recovery plan is intended to respond to all events causing a complete or temporary cessation of operations, which may or may not include destruction of critical components. Disaster recovery planning is adjunct to the larger process of business continuity planning properly covered by other MTM policies.

A. The Disaster recovery plan defines: what is to be recovered, where it is done, what needs to be accomplished, how to get it done and the sequence/timing of recovery events. All recovery-planning events are to occur within and in concert with corporate wide emergency/security policies where first priority is given to the protection of human life.
B. The role of the Information Technologies – Data Security, is to: assist, provide consulting oversight, participate as a key member of the planning integration team, establish plans for MTM technologies network systems, build and maintain corporate level designs for recovery and supervise policy compliance.
C. MTM has a fiduciary responsibility and is ultimately accountable with a vested interest in detail planning and contractual arrangements. MTM is responsible to: develop, document and conduct plan tests annually. The recovery services team combines the talents of both groups.

Methodology

The recovery services team is to employ the DR Methodology, which includes:

- Prevention or reducing vulnerabilities through awareness and the identification of preemptive controls.
- Response to events in a controlled manner, assessing situations and notifying appropriate parties. Specific business responsibilities are pre-assigned for each sub-team and task.
- Resumption support for mission critical functions and services includes how vital records will be transported, protected, who will be in charge and where recovery will occur.
- Recovery of functions and services with all necessary interfaces. Items described include which data recovery centers are to be used, alternative work facilities and where to redirect voice/data circuits including hotlines.
- Restoration and return to either original or replacement facilities. Full production is to be resumed and business continued in a normal production mode.

Planning Factors

Business unit management and the business unit Chief Information Officer (CIO) with exceptional care must make decisions regarding business criticality. Full consideration must be given to any impacts upon related systems and processes.

Disruption
Disruption impacts are time dependent. Plan activation and recovery efforts also take time. Even if normal restoration appears eminent, any event that creates serious disruption or loss should result in plan activation (at least for test purposes) within approximately 48 hours (TBD) from the initial event.

Violations
Violations of the policies, procedures, or guidelines detailed in MTM's security policies must be presented to the CIO, Legal, Compliance, Risk Management and/or Human Resources for appropriate action.

Risks
Not adhering to the policy and various fraud indicators makes MTM and individuals vulnerable to potential fraud abuse and resulting financial responsibilities.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Information Technology	Date
_____	_____
Chief Information Officer	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Data Integrity	**Policy No.:**	307
Authorized By:	President/CEO	**Date:**	11/01/2009
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	Information Technology		

PURPOSE:
To ensure data is accurate and traceable.

POLICY:
Data Integrity

RESPONSIBILITY:

- The NEMT system shall be designed to ensure accuracy of data entry. The following guidelines shall be applied to all user interfaces:
    - Drop down menus shall be utilized whenever practical
    - Correct and consistent formatting of data shall be enforced through the re-use of standard software components.
    - Application requirements shall define context specific business edits designed to ensure that data entered meets the defined data footprint
    - Persistent data shall be auto populated
    - Free form data entry shall be limited to notes and comments and data that cannot be codified.
- All applications shall operate from a single enterprise database. The following design guidelines shall be applied to the enterprise database:
    - Data shall be normalized to achieve the optimum balance between performance and data redundancy.
    - Data records shall be referenced by a unique key.
    - An audit log shall be maintained tracking changes to data.
    - The purpose of each data item shall be clearly understood, ensuring that data is correctly interpreted when presented on reports.

- Data shall be confirmed with members whenever practical ensuring that data does not decay over a period of time.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Information Technology	Date
_____	_____
Chief Information Officer	Date
_____	_____
President, CEO	Date

Corporate Policy

Subject:	Software Compliance Policy	**Policy No.:**	308
Authorized By:	Director, IT Infrastructure	**Date:**	6/12/2014
Department:	Information Technology	**Last Revised:**	6/12/2014
Applicability:	Information Technology		

PURPOSE:
Software Usage and Copyright Protection. The purpose is to clarify MTM policy concerning the use of software as it pertains to licensing agreements and the prevention of liability as related to copyright laws.

POLICY:
MTM abides by all copyright and software protection laws and will not tolerate the use of unlicensed or illegal software. Outside of external legal consequences, the use of such software is punishable by MTM with discipline up to and including termination.

RESPONSIBILITY:
Software Replication, Installation, and Duplication

1. Unlicensed duplication or use of any copyrighted or licensed software program is illegal.
2. Illegal software duplication may expose MTM and the duplicator to civil and criminal liability under copyright law. In such cases, MTM will cooperate with any investigation for civil and criminal liability.
3. In order to ensure the software publisher's copyright is not violated, no program should be copied onto MTM devices from another device or the Internet without express permission from MTM's IT Department. This is to verify a license is held to cover such installation. All software installations should be initiated and approved through MTM's IT department.
4. MTM's Legal Department and MTM's IT Department will be consulted on all signed End User License Agreements.

Monitoring

1. MTM reserves the right to scan all MTM owned technology without notice to ensure that all software has been properly licensed and assigned accordingly.
2. MTM reserves the right to refuse connectivity to any person attempting to connect to the network who refuses such monitoring.

Software Purchases

1. All software shall be purchased solely through MTM's IT Department. This is to ensure proper legal, effective and cost-effective (e.g., quantity discounts, enterprise licenses) use of all software.

Enforcement of Policy

1. Any employee found illegally replicating, installing, or duplicating software may be subject to disciplinary action, up to and including termination.
2. Any employee with information of a violation of the software or hardware policy should report the incident immediately to a manager or the IT Department.

APPROVED BY:

_____	_____
Manager, Information Technology	Date
_____	_____
Chief Information Officer	Date
_____	_____
President, CEO	Date

Corporate Policy

Subject:	Encryption Policy	**Policy No.:**	309
Authorized By:	President/CEO	**Date:**	4/1/2013
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:

The purpose of this policy is to define the acceptable use and management of encryption software throughout Medical Transportation Management, Inc. (MTM). This policy applies to all MTM employees, contractors, and others acting on behalf of MTM. Media is subject to this encryption policy until it is sanitized or destroyed in accordance with the National Institute of Standards and Technology (NIST) Special Publication (SP) 800-88, Guidelines for Media Sanitization, and/or MTM department policy or procedures.

POLICY:

MTM's general principals of encryption include:

1. All MTM-furnished laptop computers shall be secure using a Federal Information Processing Standard (FIPS) 140-2 validated encryption software solution.
2. All MTM-furnished desktop and server computers shall be secured either through the FIPS 140-2 compliant encryption software solution or through adequate physical security and operational controls at the equipment's residing location.
3. All MTM portable media (all addressable data storage that is not currently in the computers storage or memory) that contain sensitive information shall be encrypted, as specified above. All exceptions for not encrypting portable media shall be documented stating the reason for the exception and includes authorization from one senior management representative and the Chief Information Officer.
4. All MTM electronic data transmissions that contain PHI and other sensitive information will be encrypted.
5. All MTM Virtual Private Network (VPN) connections will be encrypted.
6. A key recovery mechanism shall be used so encrypted information can be decrypted and accessed by authorized personnel. Use of encryption keys which are not recoverable by authorized personnel is prohibited. MTM requires one senior management representative and the Chief Information Officer to authorize recovery of keys by someone other than the key owner.

7. Sensitive information is defined as:
    a. Personal Health Information (PHI); defined as any information about health status, provision of healthcare, or payment for health care that can be linked to a specific individual.
    b. Individually Identifiable Health Information (IIHI); defined as any subset of health information, including demographic information collected from an individual that:
        i. Is created or received by a health care provider, health plan, employer, or health care clearinghouse;
        ii. Relates to the past, present or future physical or mental health or condition,
        iii. Relates to the past, present or future provision of care to an individual, or
        iv. Relates to the past, present or future payment for the provision of health care to an individual; and
        v. Identifies the individual (or there is a reasonable basis to believe that the information can be used to identify the individual.
    c. Personal Identifiable Information (PII); defined as information that can be used to uniquely identify, contact or locate a single person or can be used with other sources to uniquely identify a single individual.
    d. MTM intellectual property, financial, and confidential data

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Information Technology	Date
_____	_____
Chief Information Officer	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Infrastructure Systems Hardening	**Policy No.:**	310
Authorized By:	Chief Information Officer	**Date:**	1/28/2013
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
Hardening is the process of securing a system or device by reducing its surface of vulnerability. Most systems or devices perform a limited number of functions. It is possible to reduce the number of possible attack vectors by the removal of any software, user accounts or services that are not related and required by the planned system functions.

System hardening is a vendor specific process, as different system vendors install different elements in a default install process.

This policy defines general procedures to be adopted for infrastructure hardening. If a specific vendor hardening procedure is available and MTM approved, it is required that both this policy and the vendor hardening procedure be used before any system or device is used in production environment.

POLICY:
This policy applies to all components of the Information Technology's infrastructure and includes:

- Computers (laptop and desktop systems)
- Mobile Devices (smartphones, tablets, mobile data terminals)
- Servers
- Application Software
- Peripherals
- Network Appliances (Routers, Switches, firewalls)
- Databases
- Telephone System

All staff within Information Technology (IT) must understand and use this policy. IT staff is directly responsible for ensuring that infrastructure systems are hardened and any subsequent changes to systems do not affect hardening.

Without effective hardening there is increased risk that can include:

- Unavailability of systems or devices caused by attackers, viruses and malware.
- Web and Email servers can advertise their type and version, making it easier for an attacker to exploit known weaknesses.
- Systems with unnecessary services and opened ports offer opportunities for attack.

The IT infrastructure will be hardened according to this policy to minimize vulnerabilities.

All new systems and devices will undergo the following hardening process:

A. INSTALL SYSTEM OR DEVICE
   Install the system or device as defined by the vendor's instructions.
B. REMOVE UNNECESSARY SOFTWARE
   Systems and devices can include a variety of software packages and functionality to all users. Software that is not going to be used for production should be removed from the system or device. MTM's approved corporate desktop, laptop and server images should be used.
C. DISABLE OR REMOVE UNNECESSARY USERNAMES
   Most systems and devices come with predefined user accounts. These accounts are provided to enable a variety of functions. Accounts relating to services or functions which are not used should be removed or disabled. All accounts which use the default vendor passwords should be changed. Predefined account names should be renamed if it will not affect the system or device use.
D. DISABLE OR REMOVE UNNECESSARY SERVICES
   All services which are not going to be used in production should be disabled or removed.
E. PATCH SYSTEM OR DEVICE
   The system or device should be patched up to date. This should include the most stable release service pack, hotfixes, and security updates.
F. PERFORM VULNERABILITY SCAN
   The system or device is scanned using the corporate approved vulnerability scanner. The IT Information Security personnel will provide this service to the infrastructure team. The result of the vulnerability scan will be reviewed and any issues identified should be resolved before proceeding.

Vulnerabilities

- If vulnerabilities are discovered, remediate and repeat steps #2 through #6.
- If there are no significant vulnerabilities the system or device can be prepared for production use.

G. INSTALL SECURITY PROTECTION

Install the organization's approved anti-virus and anti-malware software package. Verify that it receives the latest definition files prior to installation.

H. CONFIGURE FIREWALL

When possible, systems or devices that can run its own firewall should be configured and close all ports not required for production use.

I. PRODUCTION SYSTEM

The system is now ready for production use.

RESPONSIBILITY:

System hardening should include the following requirements:

- Only software that has been approved for production use by MTM's IT department and CIO may be installed on the organization's systems or devices.
- Non-essential software applications and services will be uninstalled or disabled as appropriate.
- Servers, Computers and Mobile Devices will be configured to prevent the execution of unauthorized software.
- Bios passwords will be implemented on all Computers to protect against unauthorized changes.
- The boot order of Computers and Mobile Devices will be configured to prevent unauthorized booting from alternative media.
- All Computers will be built from a standard corporate approved image. Any change to the standard corporate image must be approved by the department managers, directors and CIO.
- Access to local administrator accounts on Computers, Mobile Devices, and Servers will be restricted to members of the IT department to prevent the installation of unauthorized software and the modification of security software and controls.
- Default vendor passwords will be changed following installation and before use in a production environment.
- All Computers and Servers will be protected by anti-virus, anti-spyware, and anti-malware software. The product should be configured to automatically download the latest definition files from the vendor or corporate server daily.

- When possible, a local firewall will be installed and enabled on all Computers, Mobile Devices, and Servers. The firewall will be configured to only allow authorized incoming and outgoing traffic as defined by the IT department's application requirements.
- The use of removable media will be controlled on all Computers, Mobile Devices and Servers. This can be done using the security protection or encryption software.
- All Servers and devices must pass a vulnerability assessment prior to production use. The servers and devices will be scanned using the corporate approved vulnerability scanning software. All network and operation system vulnerabilities will be corrected prior to use.
- All systems and devices on the organizations infrastructure will be scanned for vulnerabilities every three (3) months. Any issues identified will be reviewed and rectified as appropriate.
- All systems and devices will be patched in accordance with the patch management policy.

Any MTM Information Technology (IT) department employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Information Technology	Date
_____	_____
Chief Information Officer	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Adding or Changing User Access	**Policy No.:**	311
Authorized By:	President/CEO	**Date:**	2/19/2001
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	Information Technology		

PURPOSE:
To allow Information Technology staff to add or modify user access and permissions to MTM's infrastructure resources.

POLICY:
Information Technology staff will add new user accounts to MTM's infrastructure resources upon notification of new employee hire, or other change in employee role requiring a new account via Issue Trak. Infrastructure resources are defined as any system or host on the network that can maintain or manage user accounts and permissions to data or telephony services.

RESPONSIBILITY:

A. Ensure request for new user comes from Department Head in Issue Trak.
B. Determine permissions and access rights needed for user with the Department Head.
C. Complete the addition or change as necessary and report completion to the Requestor via Issue Trak.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____
Manager, Information Technology Date

_____ _____
Chief Information Officer Date

_____ _____
President/CEO Date

Corporate Policy

Subject:	Encounter Transmissions	**Policy No.:**	312
Authorized By:	President/CEO	**Date:**	5/1/2013
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	Information Technology		

PURPOSE:
The purpose of this policy is to ensure the MTM Encounter transmission process adheres to all regulatory and HIPAA standards for EDI transmission.

POLICY:
The MTM EDI team shall manage all data transmission and protocols to ensure secure data integrity and accuracy in reporting.

RESPONSIBILITY:
Transactional datasets shall be managed in a secure data repository.

The EDI transmission will be delivered in a timely and consistent manner according to client specific criteria.

The EDI file format shall follow standard HIPAA and state requirements.

Data provided by MTM to clients, provider and facilities or from clients, providers or facilities shall be transmitted through HIPAA compliant means to safeguard confidentiality. Depending on client's data transmission policies, secure electronic transmission, also known as "transmission encryption," SSH File Transfer Protocol (SFTP) shall be utilized.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Information Technology	Date
_____	_____
Chief Information Officer	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Acceptable Use of Computer Equipment	**Policy No.:**	321
Authorized By:	President/CEO	**Date:**	4/10/2007
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
To outline the acceptable use of computer equipment at MTM.

POLICY:
MTM computer networks, equipment and connecting resources will be used in accordance with the acceptable use policy.

RESPONSIBILITY:
This policy applies to all users of MTM computer networks, equipment or connecting resources.

1. MTM Inspection of Personal Electronic Information
    a. Electronic information on MTM networks or equipment, including, but not limited to, electronic mail and personal information, is subject to examination by the MTM where (1) it is necessary to maintain or improve the function of MTM computing resources; 2) where there is a suspicion of misconduct under MTM policies, or suspicion of a violation of Federal or state law; or (3) it is necessary to comply with or verify compliance with Federal or state law.
2. Acceptable Use Guidelines
    a. Responsibilities of MTM Computer Resource User
        i. Respect the intellectual property rights of authors, contributors and publishers in all media.
        ii. Protect your user ID, password and system from unauthorized use.
        iii. Adhere to the terms of software licenses and other contracts. Persons loading software on any MTM computer must adhere to all licensing requirements for the software. Except where allowed by MTM site licenses, copying software licensed for MTM use for personal use is a violation of this policy.

iv. Adhere to other MTM policies, including MTM Personnel Policies and policies established for a specific resource.
v. Adhere to data access policies of MTM or those established by law.
vi. Use MTM computer resources in a manner that is compliant with MTM policies and State and Federal law.

b. Prohibited Uses of MTM Computer Resources
   i. Unauthorized or excessive personal use. Use may be excessive if it conflicts with company resource requirements, overburdens the network, results in substantial use of system capacity, or otherwise subjects the institution to increased costs or risks (employees additionally may be subject to discipline for unauthorized or excessive personal use of computer resources.)
   ii. Uses that interfere with the proper function of the MTM's information technology resources are prohibited.
   iii. Uses that unreasonably interfere with the ability of others to make use of MTM computer resources are prohibited.
   iv. Attempting to gain or gaining unauthorized access to the computer system, or files of another is prohibited.
   v. Use of MTM computer resources to infringe the intellectual property rights of others is prohibited.
   vi. Use of MTM computer resources for personal profit is prohibited.

3. Enforcement of Acceptable Use Policy
   a. Violation of the Acceptable Use Policy may result in a denial of access to MTM computer resources, and those disciplinary actions provided or authorized by the Personnel Policies of MTM.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Information Technology	Date
_____	_____
Chief Information Officer	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Electronic Communications	**Policy No.:**	326
Authorized By:	President/CEO	**Date:**	6/25/2007
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
This Electronic Communications Policy ("Policy") outlines the policies and guidelines that must be followed at all times to minimize business risks and maximize the benefits of electronic communications within MTM. All employees, contractors, and any other persons having access to Electronic Communications Resources managed by MTM must comply with the terms of this Policy.

This Policy should be reviewed in conjunction with the Employee Manual and MTM policies regarding Records Retention and Compliance. The management of electronic communications records in electronic and printed form is subject to federal, state and municipal laws as well as MTM's Records Management policies, including their provisions regarding retention and disclosure.

MTM owns, has a property interest in or has a right to specify the use of:

- All information processing and communications facilities employed in its business, including computers, fax machines, telephones, voice mail, smart phones, pagers, e-mail devices, televisions, security systems, copiers, software, online accounts, e-mail facilities, facilities for Internet/Intranet/Extranet access, storage media, network accounts, computer, e-mail and instant messaging files and messages and related equipment and documentation employed or stored in its offices and facilities and
- All such information processing and communications facilities employed in its business that are connected to or able to be connected to its facilities from locations outside of the MTM's premises, including personal information processing and communications equipment and software owned or leased by MTM personnel or supplied by MTM to its personnel for their use.

All such resources are collectively referred to in this Policy as “Electronic Communications Resources” or “Resources”. References to the “MTM network” include the Electronic Communications Resources at and connected to the MTM’s network in its entirety.

The purposes of this Electronic Communications Policy are to:

- Establish policies on privacy, confidentiality and security for electronic communications.
- Ensure that Electronic Communications Resources are used for purposes appropriate to the MTM’s business.
- Inform all employees of MTM about the applicability of laws and policies with respect to electronic communications.
- Ensure that Electronic Communications Resources are used in compliance with all applicable laws and policies.
- Provide guidance concerning rights and responsibilities with respect to the proper use of Electronic Communications Resources.

POLICY:

This Policy applies to:

- All Electronic Communications Resources owned or managed by the MTM.
- All Authorized Users and uses of the MTM’s Electronic Communications Resources.
- All MTM electronic communications records in the possession of the MTM’s Authorized Users.
- The contents of electronic communications and to the electronic attachments and transactional information associated with such communications.

This Policy applies only to electronic communications records in electronic form that are stored or shared via the Electronic Communications Resources.

MTM expects that Authorized Users will be sensitive to the underlying spirit and intent of this Policy and will look to the goals that this Policy is intended to achieve. They should not attempt to do indirectly what this Policy prohibits directly, and they should not employ means to defeat the goals that this Policy is intended to achieve, even though those means may not have been mentioned in this Policy.

While MTM has endeavored to have this Policy reflect the state of MTM’s technology as of the date of its adoption, technological developments may outstrip the literal text of certain aspects of this Policy.

MTM reserves the right to revise or withdraw this Policy and to add any rules, policies, or procedures to this Policy at any time in order to maintain safe and efficient operation of MTM. MTM personnel will be notified of any such amendment.

In all situations, including those where there are no applicable legal principles or the law is unclear or in conflict, MTM personnel are expected to use the Electronic Communications Resources in a manner that can be supported by MTM, and to exercise good judgment in the discharge of their responsibilities with respect to the Resources.

Changes to this Policy require approval by MTM's CIO. The primary responsibility for enforcement of this Policy and its operating procedures rests with MTM's CIO. Department Directors are responsible for ensuring the directives are implemented and administered in compliance with the approved Policy.

No part of this Policy or its supporting operating procedures should be interpreted as contravening or superseding any other legal and regulatory requirements placed upon MTM. Protective measures should not impede other legally mandated processes such as records retention requirements or subpoenas. Any conflicts should be submitted immediately to the CIO for further evaluation and/or subsequent submission to MTM's legal counsel.

RESPONSIBILITY:

USAGE RULES:

Ownership

MTM owns, leases or has the right to specify the use of all Electronic Communications Resources. No employee has any property interest in the Electronic Communications Resources.

Authorized Users

Employees of MTM are eligible to use the Electronics Communications Resources but may do so only in accordance with this Policy.

The prerequisites to MTM's employees obtaining access to MTM's Electronic Communications Resources include the following:

- An approved request for access to the Resources signed by the employee's Department Director or designee.
- Completion of mandatory training in the use of the Resources by the employee.

Each employee, including new hires, shall receive training on the use of MTM's Electronic Communication Resources by HR and/or the Information Technology department, with specific procedural training regarding security and controls. Emphasis on an employee's responsibilities and rights in the use of Electronic Communications Resources will be underscored.

In some instances, temporary employees and outside contractors may be given access to MTM's Electronic Communications Resources with proper authorization from the department Director and with the approval of the CIO. Any outside personnel given access to MTM's Electronic Communications Resources are Authorized Users and are subject to the same policies as employees and must undergo the same training as specified above.
Personal Use

MTM's Electronic Communications Resources are an asset which must be used primarily for legitimate municipal business purposes. Personal use is not forbidden, but such use:

- Must be limited and not affect work performance and normal business activities.
- Must not interfere with the MTM's operation of Electronic Communications Resources.
- Must not compromise the security or reputation of MTM.
- Must not burden MTM with noticeable resource utilization.
- Must not incur cost to MTM.

Permissible personal use does not include uses requiring substantial expenditures of time, uses for profit or use that would otherwise violate MTM policy with regard to employee time commitments or MTM equipment.

Unacceptable Use
The following activities are unacceptable and are prohibited with respect to the Resources. Activities that fall into the category of unacceptable and prohibited use include:

- *Discrimination*: Authorized Users will not send discriminatory messages based on race, age, disabilities, gender, sexual orientation, or religious or political beliefs or other basis that is protected under applicable law.
- *Fraudulent Offers:* Authorized Users will not make fraudulent offers of products, items or services originating from any MTM account.
- *Harassment*: Electronic Communications Resources will not be used for conducting personal attacks on others to include harassment or threats or defamation of character.
- *Insensitive Language:* Authorized Users must not send messages or communications containing offensive, derogatory or abusive language.
- *Intellectual Property Infringement:* Authorized Users must not infringe the copyright or other intellectual property rights of third parties.

- *Objectionable Material:* Authorized Users are prohibited from sending or accessing pornography and/or sexually explicit content.
- *Personal Gain:* Electronic Communications Resources may not be used for personal financial gain.
- *Profanity*: Authorized Users may not use profanity in their electronic communications.
- *Unlawful Activities*: Authorized Users must not engage in illegal or wrongful conduct.
- *Unsolicited Communication:* Authorized Users are prohibited from sending or supplying unsolicited personal views on social, political or other non-business related matters using Electronic Communications Resources.
- *Unsubstantiated Claims*: Authorized Users are prohibited from using the Electronic Communications Resources to exchange gossip or personal information about themselves or others or rumors, exaggerated claims or unsubstantiated opinions relating to MTM.

Resource Restrictions

Authorized Users shall not employ the Electronic Communications Resources for purposes that could reasonably be expected to cause excessive strain on any Electronic Communications Resources, or unwarranted or unsolicited interference with others' use of the Electronic Communications Resources. Restrictions include:

- Automatic forwarding
- Chain letters and malicious code
- DOS attacks
- E-mail-bombs
- Illegal software
- Source code
- SPAM

PERSONAL ACCOUNTS:

Account Ownership

Authorized Users are responsible for their own accounts. Authorized Users shall not provide their account and password information to another individual or allow another individual to access MTM resources using an account or access which has not been assigned to them.

E-mail/FAX Signature

E-mail and fax signatures are to provide only relevant contact information. Signature formats to be used at MTM are defined in Procedure 901-004 E-mail Signature Standard.

E-mail Stationery
The use of personal themes or stationery or graphic-based backgrounds in the e-mail system is prohibited.

E-mail/FAX Disclaimers
Disclaimers, including those referencing the indication of privileged, proprietary or confidential information, shall not be used. MTM's e-mail/fax systems will generate the company approved disclaimer's attached to all outbound e-mail and faxes.

False Identity and Anonymity
Authorized Users shall not employ a false identity (the name or electronic identification of another) or forge/attempt to forge any portion of e-mail or instant messages. Authorized Users may not send e-mail anonymously (the sender's name or electronic identification are hidden).

E-MAIL:
The e-mail system shall be used for the transmission of information and not for the storage of information.

E-mail as a Public Record
E-mail is a method of communication commonly used at MTM. Most e-mail is a public record when sent or received as part of normal business transactions. Some examples of e-mail messages (including messages with attachments) that are public records include:

- Policies and directives
- Correspondence related to official business
- Meeting agendas or minutes
- Official reports
- Material that has legal or historic value

Personal e-mail is not a public record. E-mail related to legally protected issues such as Personnel, Economic Development, Attorney-Client Privilege, etc., are public records but may not be open to the public for review. If there is a question as to whether an e-mail is open to the public, please consult MTM's CIO and/or General Counsel or confer with your department's Director.

E-mail Custodian
The custodian of an e-mail message will normally be the originator if that person is a MTM employee; otherwise, it will be the person to whom the message is addressed once the

message has been received. The custodian is responsible for ensuring compliance with the Public Records Act and with the MTM's Record Retention schedule.

E-mail Retention

Authorized Users are responsible for the review and subsequent deletion or retention of e-mail, both received and sent. E-mail that needs to be retained shall be moved to an appropriate storage medium; those that do not need to be retained shall be deleted. The determination shall be made using the same criteria which is applied to information sent or received using any other means of communication. E-mail Retention policies are controlled by MTM's Information Technology department.

E-mail containing information of lasting value, such as policy interpretation or decision issuance, must be retained in accordance with MTM's Records Retention and Disposition Schedule.

Many e-mails have limited or short-term value and should be deleted as soon as they no longer serves an administrative purpose. Some examples of this type of e-mail may include:

- Those equivalent to a phone conversation or brief discussion about daily functions
- Meeting requests
- Appointment confirmations
- General announcements
- Advertisements
- News from other municipalities, organizations or businesses
- "Junk" e-mails
- Personal e-mails
- E-mail that functions as telephone messages

Automatic Deletion of E-mail

MTM does not automatically delete e-mails from each Authorized User's mailbox.

Archived e-mail

E-mail may be restored from archives/back-ups only for purposes such as

- Disaster recovery & business continuity
- User request, user's supervisor, and/or user's department Director
- CIO
- General Counsel

EXTERNAL SYSTEMS:

Use on MTM Business

MTM-related correspondence or any MTM-related information may not be communicated or conducted via external e-mail systems or personal e-mail accounts.

INSTANT MESSAGING/CHAT:

Instant messaging (IM) applications may be used in connection with MTM business only if enterprise IM software is installed and approved by MTM. Authorized Users shall not store or save Instant Messaging communications. This includes, but is not limited to, the use of selective logging functionality.

STREAMING MEDIA:

Streaming media may be used only for MTM business. Streaming entertainment content such as audio from radio stations or video from sites such as youtube.com is prohibited except for valid MTM business purposes such as research or training. Request for temporary access to such media shall be coordinated through the IT Department.

COPIERS, PRINTERS AND FAX SYSTEMS

The use of MTM owned copiers, printers and fax (facsimile) systems is restricted to MTM business and Authorized Users shall not use these systems for personal or private purposes.

TELEPHONE AND VOICE MAIL

Voice-mail Retention

The content of voice messages should be handled in accordance with State and MTM retention policies. Voice-mails should be erased or deleted following completion of any action taken as a result of the message or the transference of the information contained in the voice message, such as typing or writing notes in reference to its content.

SECURITY

E-mail Security

Authorized Users should be aware that e-mail messages by themself are not considered secure and can be potentially accessed by others. There is no guarantee of delivery and they may be tampered with by a third party. They may also be intercepted, incorrectly addressed or easily forwarded to third parties. Authorized Users will be held responsible for all e-mail activity from their accounts.

Protection against Malicious Code

- Authorized Users may not transport files from non-MTM machines to MTM computers.
- Authorized Users are prohibited from disabling anti-virus software running on MTM-provided computer equipment as provided and maintained by the Information Technology Department.

CONFIDENTIALITY:

Transmission of Confidential Information via E-mail

In most instances, confidential information should never be communicated via e-mail. Employees authorized to reveal confidential information to another via e-mail must specifically designate such information as 'CONFIDENTIAL' within their correspondence. Before revealing confidential information to outsiders, MTM employees should ascertain whether outside law firms, rating services, and other outside consultants to whom confidential information may be given have confidential compliance procedures in place to guard against any misuse of such information by members of such firms.

Confidential Files

Additional precautions should be taken when sending documents of a confidential nature. Employees who must transfer confidential documents via e-mail are to ensure that the intended recipient is fully aware that the correspondence is 'CONFIDENTIAL'. Avoid using file names that might disclose confidential information. Confidential files should be password protected or encrypted. File protection passwords are NOT to be communicated via e-mail correspondence in any event, and other arrangements are to be made for the disclosure of the password. See the Information Technology Department for assistance or training on sending encrypted emails.

SOCIAL MEDIA:

To address the every-changing landscape of the Internet and the ways residents communicate and obtain information online, MTM may consider participating in social media formats to reach a broader audience. The MTM encourages the use of Social Media to further the goals of the MTM and missions of its departments where appropriate.

All official MTM presences on social media sites are considered an extension of the MTM's information networks and are governed by this policy.

Whenever possible, links to more information should lead to the MTM's official website for more information, forms, documents or online services necessary to conduct business with the MTM.

Business Use
Every Department is encouraged to use social media tools for business reasons. Approval for use of these tools by Authorized Users must be obtained by the Department Director and/or the CIO.

Authorized Users shall not include personally identifiable or confidential information, such as Social Security numbers, phone numbers or other personal information in the body of social media content. Anonymous posting is not permitted.

Social Media is for business communications and for the purpose of fulfilling job duties, in accordance with MTM goals and objectives and not for personal use.

Online Discussion
If an Authorized User uses his or her personal e-mail address or Internet account to subscribe to any Internet newsgroup, public forum, online discussion group, blog site or mailing list or creates a personal blog, he or she shall not discuss MTM businesses details or disclose confidential information in any of those places.

Employees should obtain approval from their Department Director before subscribing to online discussion groups such as Internet newsgroups, public forums and mailing lists using a MTM e-mail address.

Assuming that permission has been obtained, all postings by employees from the MTM e-mail address should include a disclaimer stating that the views expressed are strictly their own and not necessarily those of the MTM, unless otherwise authorized.

PORTABLE RESOURCES:
Laptops, notebooks, tablets, personal digital assistants (PDAs), cell phones, cell phone/PDA combinations, smart phones, pagers and other transportable information processing and communications devices are Electronic Communications Resources within the meaning of this Policy. Authorized Users are responsible to ensure the availability and security of assigned portable Resources at all times.

Devices that are capable of storing MTM information and data – such as USB (Universal Serial Bus) drives, laptops, notebooks and PDAs – must be password protected. Devices that are highly transportable and easily lost should not be used for long-term storage of MTM data and should be encrypted using MTM approved software.

Authorized Users should lock portable devices in a desk drawer or cabinet prior to leaving the office or should lock offices when away for an extended period of time or overnight (if the devices are not transported with the User).

When traveling with portable devices:

- Be aware of their location at all times.
- Keep them secure.
- Do not leave them unattended.
- Keep them out of sight unless in use.
- Keep them on your person, in your briefcase or PC carrying bag. Do not check portable devices in airline luggage systems.
- Do not leave them unattended in any vehicle.
- Avoid non-employee's to see information displayed.

MTM may require transportable information processing and communications devices to be configured with the necessary controls and security features before being used for MTM business.

REMOTE ACCESS AND USE:

In certain circumstances, MTM may permit certain Authorized Users to access the MTM network and work remotely either generally or for temporary periods. In these cases the MTM will provide equipment as needed to facilitate remote access.

All supplied equipment and software and the information stored in them are Resources within the meaning of this Policy, and this Policy is intended to apply to them to the maximum extent that is physically and technologically meaningful. Specifically:

- To the extent that these Resources have been supplied by the MTM they must be returned to the MTM once employment is terminated.
- These supplied Resources must not be altered in any way (e.g. upgraded processor, expanded memory, additional software, or additional circuit cards) without the approval of the Information Technology Director and/or CIO.
- Any exchange of MTM or customer data from a remote location with the MTM network must be conducted using one or more security features or procedures approved by the Information Technology Director and/or CIO.
- Authorized Users must report promptly any damage to or loss of any supplied Resources that have been entrusted to their care.
- Personal equipment will not be used to access MTM Resources or networks, with the exception of Internet-enabled application (e.g. Outlook Web Access). If personal

equipment is approved for use at MTM, they must confirm to all security standards and meet policy acceptance standards as well as having virus protection software installed.

- Remote control/direct access software or systems which enable external entities to gain control of MTM Resources may not be used unless approved by the Information Technology Director and/or CIO.

MONITORING, AUDITING AND ACCESS:

The MTM retains the right to monitor and audit all use of the Resources, regardless of where such use is initiated, and to access all files and messages stored on or processed through the Resources. Although the use of passwords and other forms of security are provided for confidentiality, no User has, or should expect any, personal right of privacy with respect to any file or message contained within or processed through the Resources or with respect to any use of those Resources.

This Policy distinguishes between access and monitoring. Access involves opening and reviewing the content of files. Monitoring focuses on traffic patterns, general and individual levels of usage, file subject and types, file origins and destinations, and network efficiency and security. It generally does not involve opening and reviewing the content of files. Auditing may involve both access and review of monitoring records, depending on the subject matter of the audit.

Purposes

The Electronic Communication Resources may be monitored and audited, and the files on and processed through the Resources may be accessed, by authorized personnel for a number of purposes including maintaining and protecting the Resources for the benefit of MTM compliance with law or, if necessary, undertaking the professional obligations of the MTM, ascertaining and helping to ensure compliance with the MTM's policies, and helping to ensure the proper operation of the Resources, including measurement of network traffic and investigation of suspicious circumstances. Monitoring is used only to obtain information that is relevant to the workplace, and is not used to obtain confidential personal information.

Surveillance Software

MTM may use system software and software utilities (collectively, "surveillance software") to log, analyze and document use of the Resources and supervisors may receive reports generated by such software. The surveillance software may also be applied to transmissions with the MTM network from remote locations and from portable devices.

Third Parties
MTM reserves the right to employ third parties to assist with monitoring and surveillance, including intrusion detection, “white hat” penetration and receipt of technological advice.

Extent of Monitoring
MTM may engage in the systematic monitoring of electronic communications or other electronic files created by Users for valid business purposes, including employee supervision. All Users will be informed of such monitoring and will be required to consent to such monitoring as a condition of employment.

Extent of Access and Disclosure
Authorized managers and supervisors may access or disclose private electronic communications or files of an employee for any valid business purpose. Employees will be so informed and required to consent to such access as a condition of employment.

REPORTING, VIOLATIONS AND ENFORCEMENT:
Reporting
Every Authorized User has a duty to report all suspected and known violations of this Policy and problems with the Resources to his or her immediate supervisor as soon as possible. Any violation which may result in a possible security risk or loss of data, data integrity or resource usefulness will be reported to Information Technology as soon as possible.

Unauthorized Users
Any use of the Electronic Communications Resources by any person who is not an Authorized User is strictly prohibited. Any such unauthorized use will be referred to appropriate authorities for action, regardless of whether such unauthorized use resulted in any loss to MTM.

Authorized Users
Failure to conform to this Policy or any provision of it provides a basis for disciplinary action, which may include revocation of the privilege to use one or more of the Resources or dismissal, in addition to any further disciplinary or other actions MTM may deem appropriate.

DEFINITIONS:
Alias: An alternative name or electronic identification for oneself. An alias can be anything from a corporate name, a business department or a personal nickname. Mail sent to an e-mail alias will be directed to the e-mail address for that alias.

Attachment: An attachment includes any file that is included with or attached to an electronic communication between an originator and a receiver.

Authorized User: Any person who uses the Electronic Communication Resources with proper authority. The term includes employees of the MTM who have completed the required prerequisites for use and persons who are not employees and have been properly authorized to use the Electronic Communication Resources.

Automatic Forwarding: A setting which allows messages addressed to your e-mail account to be automatically sent (forwarded) to another e-mail address.

Blind Carbon Copy (BCC): This term means that an original or carbon copied recipient will not know that a copy of the message is going to another person.

Carbon Copy: The carbon copy "cc:" is a message that is addressed to another person in addition to the addressee(s), that is, the person or persons in the "to:" line.

Chain Letter: E-mail intended to be sent to successive people. Typically the body of the note has direction to send out multiple copies of the note and promises good luck or money if the direction if followed.

Denial of Service (DOS) Attack: A method of attacking a server by sending an abnormally high volume of requests over a network, which essentially slows down the performance of a server, such that the server is unavailable for Authorized Users.

Electronic Communications: Any communication transmitted electronically via the use of Electronic Communications Resources.

Electronic Mail: The term "Electronic Mail" or "e-mail" is any information that is transmitted electronically through a mail protocol such as SMTP or IMAP. E-mail messages and logs may be considered legal documents in courts of law.

E-mail-bomb: Characterized by abusers repeatedly sending an e-mail message to a particular address at a specific victim site. In many instances, the messages will be large and constructed from meaningless data in an effort to consume additional system and network resources. Multiple accounts at the target site may be abused, increasing the denial of service impact.

E-mail Signature: An e-mail signature is information that is included at the end of your e-mail messages to give the recipient more information about you. It usually contains your name, title, address, phone number, etc.

Forward: The action of sending an e-mail message received to someone other than the intended original recipient(s).

Instant Messaging: A service that alerts users when friends or colleagues are online and allows them to communicate with each other in real time through private online chat areas.

Mailbox: An electronic mailbox receives and stores e-mail messages until they can be retrieved by a recipient.

Malicious Code: Malicious code takes many forms, including viruses, worms, Trojan Horses and spyware. Malicious code can be transmitted in attachments to an e-mail, by downloading infected programming from other sites and can be present on a diskette or CD. Creators of malicious code are extremely inventive and constant vigilance is required to avoid infection.

Newsgroup: An online discussion group; sometimes called Forums.

Phishing: A phish is an e-mail message that is designed to appear as though it came from a financial institution, government agency or commercial site and is intended to deceive the user into revealing sensitive information such as bank account numbers, passwords, and social security or other national identification numbers.

Social Media: Includes various forms of information sharing and uses technology to create web content producing communication and conversations. The many technologies and forms include RSS and other syndicated web feeds, blogs, wikis, photo-sharing, video-sharing, podcasts, social networking, social bookmarking, mashups, widgets, virtual worlds, microblogs, etc.

Spam: Spam (also called “Unsolicited Commercial E-mail” or “UCE”) is a term used to describe an e-mail with many copies that is sent out over the Internet is an attempt to force the message on people who would not otherwise choose to receive it. Most spam is commercial advertising, often for dubious products, get-rich-quick schemes, or quasi-legal services. This type of message can also contain Malicious Code.

Subject Line: The location in the e-mail where you put the topic of your message.

Web-Based E-mail: An e-mail account that is accessed through a Web browser, such as Microsoft Internet Explorer.

White Hat: A type of hacker who identifies security vulnerabilities in a computer system or network primarily to expose the vulnerability to the administrators so that it can be fixed before it can be taken advantage of by other.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Manager, Information Technology	Date
_____	_____
Chief Information Officer	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Electronic Passwords	**Policy No.:**	333
Authorized By:	Chief Information Officer	**Date:**	8/10/2010
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
The purpose of this policy is to establish a standard for creation of strong passwords, the protection of those passwords, and the frequency of change. Passwords are an integral aspect of our corporate security program. Passwords are the front line of protection for user accounts.

POLICY:
The scope of this policy includes all personnel who have or are responsible for an account or any form of access that supports or requires a password on any MTM system. As such, all MTM staff, outside contractors and vendors with access to our systems is responsible for taking the appropriate steps, as outlined below, to select and secure their passwords.

DEFINITIONS:
Client: Refers to the customer contracted with MTM to handle the covered benefit offered to their covered population.
Member: Refers to the population served by MTM Clients. Often referred to as participants, beneficiaries, clients, recipients and other terms; for MTM purposes, member is being used as a standard meaning for the Client's covered population.

RESPONSIBILITY:
System-Level Passwords:

- All system-level passwords (e.g., root, enable, admin, administrator, application administration accounts, etc.) are required to be changed every 90 days. If this cannot be completed, the reason should be documented and approved by the Chief Information Officer (CIO).
- Passwords must be at least 8 characters in length.

- Where SNMP (system network management protocol) is used, the community strings must be defined as something other than the standard defaults of "public," "private" and "system" and must be different from the passwords used to log in interactively.
- System-level passwords must not be inserted into email messages or other forms of electronic communications.
- All system-level passwords must conform to the password format guidelines described below.
- All systems administrative-level passwords must be stored securely and available to the Chief Information Officer (CIO).

User-Level Passwords:

- All passwords (e.g., email, web, desktop computer, etc.) must be changed every 90 days.
- Passwords must be at least 8 characters in length.
- Passwords must not be inserted into email messages or other forms of electronic communications except when it's requested by MTM's IT Department for application and computer assistance. Any other requests for user-level passwords should be reported to your manager and security@mtm-inc.net for approval.
- User-level accounts must not contain system-level privileges granted through group memberships or programs.
- All standard user passwords must conform to the password format guidelines described below.

Password Format Guidelines:

All system-level and user-level passwords must meet the following complexity requirements. Complexity requirements are enforced when passwords are created or changed. Passwords must contain characters from three of the following five categories:

- Uppercase characters of European languages (A through Z)
- Lowercase characters of European languages (a through z)
- Base 10 digits (0 through 9)
- Non-alphanumeric characters (~ ! @ # $ % ^ & * _ - + = ` | \ ( ) { } [ ] : ; " ' < > , . ? /)
- Any Unicode character that is categorized as an alphabetic character but is not uppercase or lowercase.

Password Management Guidelines:

The following are effective password management techniques for storing and maintaining system-level and user-level passwords. Effective password management is taken to mean password management that is secure, supported, and approved by the Information Technology Department (IT).

- Passwords should never be written down and left unsecure (stored on paper, left under your keyboard, on a sticky note taped to your monitor, etc.)
- The use of password management software that includes 256-bit AES encryption is recommended. The password database should only be stored internally on the MTM network.
- Passwords must not be included in unsecure email messages or other unsecure forms of electronic communication.
- Passwords and logon information will be sent independently of one another in separate emails
- Never give your password out unless required by IT's infrastructure or applications department for providing user-level support services. Passwords must not be shared with supervisors, co-workers (part-time, full-time and contractors), vendors, clients, friends, and relatives.

If a system-level or user-level password is suspected to have been compromised, report the incident immediately to your manager, email security@mtm-inc.net, and call IT immediately at extension 5800 for an immediate password reset.

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Information Technology	Date
_____	_____
Chief Information Officer	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Software Development Lifecycle	**Policy No.:**	334
Authorized By:	Director, Information Technology-Applications	**Date:**	10/1/2013
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
The purpose of this policy is to establish a minimum set of requirements and responsibilities for implementing and utilizing a Software Development Lifecycle (SDLC). SDLC is a methodology for implementing an *application project* by following a sequence of standard steps and techniques. In combination with project management, the SDLC improves the capability of application projects to deliver as expected, on time, and within budget. This will increase efficiency and effectiveness of development, training, security and use of the application to the company and employees.

POLICY:
This policy applies to all major application projects, both new applications and upgrades of existing applications. They include applications that are owned by MTM, Inc., irrespective of where such applications are hosted. A simplified implementation should be used of this SDLC for certain application projects as deemed necessary by the Chief Information Officer (CIO).

This policy is to define a standard for the creation and major revisions of software applications. It does not address routine maintenance or routine updates which occur as part of the operational management of an application. This does not address the retirement of an application.

The SDLC is meant to operate under the umbrella of Agile Methodology. Agile is used in software development to help teams respond to unpredictability through incremental and iterative work cadences.

RESPONSIBILITY:

Application Owners: The application owners are responsible for executing this SDLC and submitting the resulting artifacts to the CIO. The submission should consist of names and signatures of all application owners, and the actual artifacts. (Artifacts are the documents, diagrams, etc., that are created as a result of following the SDLC.)

Project Managers: The project manager must jointly consider this SDLC as an integral part of the overall project plan.

CIO: The CIO is responsible for enforcing this policy.

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Information Technology-Applications	Date
_____	_____
Chief Information Officer	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Data Classification	**Policy No:**	335
Authorized By:	President/CEO	**Date:**	11/1/2013
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
To ensure the appropriate level of protection is applied to MTM's data and enable those who handle data to be able to easily make decisions when managing the data.

This policy applies to all data generated, accessed, modified, transmitted, stored or used by MTM, irrespective of the medium on which the data resides (paper, hard drive, CD/DVD, USB, etc.), or the format of the data (text, graphics, video, voice, etc.).

POLICY:
N/A

DEFINITION:
Data owners are those who generate data or those whom data are entrusted. Data owners assign the classification categories to their data and have the primary responsibility for ensuring the appropriate use and security of the data. "Data Owners" is used as a term of reference for the purpose of this and related MTM policies and does not refer to the actual legal ownership of particular data.

RESPONSIBILITY:
All MTM data must be classified into one of three sensitivity levels by the appropriate data owner: **Confidential, Private or Public.** A document, file or information system is classified according to the most sensitive level of data contained therein and should be labeled in accordance with the data labeling standard.

A. **Confidential (High Sensitivity)**
   Data should be classified as Confidential if its unauthorized disclosure could result in significant legal, financial, reputational, or other adverse impact upon MTM, due to legal or regulatory requirements, MTM policies or agreements to which MTM is a party, or because of the sensitivity of the information. Examples of Confidential data can be found in Appendix A.
B. **Private (Medium Sensitivity)**
   Data should be classified as Private when the unauthorized disclosure, alteration or destruction of that data could result in harm to MTM's image or reputation, or could undermine the confidentiality of MTM business or processes, but would not necessarily violate existing federal or local laws, MTM policies, or MTM contracts. Data in this category are not routinely distributed outside of MTM, and distributed within MTM on a need-to-know basis. Examples of Private data can be found in Appendix A.
C. **Public (Low Sensitivity)**
   Data should be classified as Public when the unauthorized disclosure, alteration or destruction of that data would result in little or no risk to MTM and its affiliates. Public data has no legal or other restrictions on access or usage and may be open to the general public. Examples of Public data can be found in Appendix A.

Data owners are responsible for classifying data under this policy.

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, Information Technology	Date
_____	_____
Chief Information Officer	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Pandemic Preparedness	**Policy No.:**	336
Authorized By:	President/CEO	**Date:**	1/28/2014
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE: To ensure MTM's preparedness for the potential impact of a pandemic as the services MTM provides will be more critical than ever.

POLICY: In the instance of a pandemic, MTM departments will implement the defined actions for continuity of business and reduction of the potential spread of the identified threat to all employees.

RESPONSIBILITY:

1. During the pandemic, employees who have remote access to MTM systems will be critical. MTM employees who have been issued laptops will be asked to work from home to decrease the risk of acquiring/spreading known threat; and to maintain an integral level of operation in all departments and offer support to more vital functions if necessary.
2. The IT department will prioritize their focus on ensuring the technical infrastructure is running on computer operations and business applications.
3. Call center operations must be able to function at an adequate level to provide basic services. MTM will utilize remote call center locations if the corporate call center is compromised, and/or some staff may be set to work remotely.
4. Claims adjudication and claims reconciliation must maintain scheduled payment dates to rendering providers and transportation providers. These processes can be done with remote access.
5. Accounting is critical to ensure payments to rendering providers, transportation providers and employee payroll are met. Remote access will be utilized to perform these functions.
6. Other departments will continue their functions at basic service levels to maintain contractual obligations, and also serve as auxiliary resources for vital MTM services.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, IT	Date
_____	_____
Chief Information Officer	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Change Controls and Tracking	**Policy No.:**	337
Authorized By:	President/CEO	**Date:**	2/8/2014
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE: To define uniform processes for accepting, managing, and completing requests for change within the Information Technology (IT) group.

POLICY: MTM has individual roles and separation of duties enforced between various technical and operational teams. MTM's change control procedures are enforced to protect against any negative business impact and to track past changes.

RESPONSIBILITY:

1. IssueTrak is MTM's system of record for recording past and pending changes to any and all of MTM's systems.
2. After entering a change request into IssueTrak, notification is sent to the appropriate IT personnel and/or executive and management teams.
3. All afore mentioned stakeholders are expected to review and provide feedback indicating any and all negative business impact that could result if change request is granted.
4. After review of any and all feedback, the change is implemented, rejected, or rescheduled to avoid any negative business impact.
5. Status of requests, completion of requests, and internal notes regarding the change requests are stored and maintained through MTM's IssueTrak system for overall business transparency.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director IT	Date
_____	_____
Chief Information Officer	Date
_____	_____
President/CEO	Date

Corporate Policy

Subject:	Patch Management	**Policy No:**	338
Authorized By:	Chief Information Officer (CIO)	**Date:**	4/14/2014
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
To ensure that operating systems and applications patches are implemented in a timely and controlled manner. Maintaining current patch levels is a vital component in ensuring the operational availability, confidentiality and integrity of the company information systems. Proactive patch management has become a requirement in order to counteract the significant increase of vulnerabilities that place our systems at risk to attack and operational impacts.

Security vulnerabilities are inherent in computing systems and applications. In order to effectively mitigate risk, software updates, patches, and service packs are made available to remove a given security vulnerability.

Given the large number of computer workstations and servers that comprise the enterprise network, it is necessary to leverage a patch management solution that can effectively distribute security patches in a timely manner.

POLICY:
All applications and processing devices that are attached to MTM's technology infrastructure shall be kept up to date with security related patches made available by the software or hardware vendors in a timely manner.

RESPONSIBILITY:
Information Technology is responsible to ensure that all company computing systems and applications have an effective operating patch management solution.

This patch management solution will include the following requirements at a minimum:

- Maintain current software to all company computing systems and applications on training, testing, development, and production networks unless a compensating control is documented and recorded with Information Security as an approved exception. If a compensating control is not available or feasible, then this further exception must be recorded with Information Security and have the approval of the CIO. These updates shall be maintained to keep risks to a minimum while still maintaining normal operational status to all business applications.
- A change control process will be followed to ensure patches are being implemented with proper controls.
- A maintenance window will be established to allow for installation of non-critical patches and service packs.
- System and application owners will perform the appropriate testing prior to implementation of the patch into the production environment.
- The time-frame for patching completion will be based on the criticality of the vulnerability and the overall risk to our environment (see table below).

Patch Categories	Definitions	Patch Completion Time-Frames
Critical *	*Patches which directly address a security threat with a potential for major impact.*	Patches will be applied within **30 days after notification** by the security team performing the security risk assessments.
Non-Critical *	*Patches that have moderate or no security implications.*	Patches applied during the next scheduled maintenance window, but no later than 60 days after notification by the vendor.
Service/Cumulative Packs *	*An aggregation of multiple non-critical patches.*	Patches applied during the next scheduled maintenance window, but no later than 120 days after notification by the vendor.

Patch Categories and Patching Time-Frame

* If the risk cannot be mitigated within the required days, an explanation should be formally documented outlining why and when it will be resolved. This report will be managed by the IT security team that is responsible for performing the security risk assessments. This information will then be reported quarterly to IT Directors and the CIO.

This policy is reviewed by the Quality Management Committee on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____	_____
Director, IT Infrastructure	Date
_____	_____
Chief Information Officer	Date
_____	_____
President/CEO	Date

Corporate Procedure

Subject:	Pandemic Preparedness	**Procedure No.:**	300.002
Authorized By:	Director/Information Technology	**Date:**	1/28/2014
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE: To ensure MTM's preparedness for the potential impact of a pandemic as the services MTM provides will be more critical than ever.

POLICY: In the instance of a pandemic, MTM departments will implement the defined actions for continuity of business and reduction of the potential spread of the identified threat to all employees.

RESPONSIBILITY:

1. During the pandemic, employees who have remote access to MTM systems will be critical. MTM employees who have been issued laptops will be asked to work from home to decrease the risk of acquiring/spreading known threat; and to maintain an integral level of operation in all departments and offer support to more vital functions if necessary.
2. The IT department will prioritize their focus on ensuring the technical infrastructure is running on computer operations and business applications.
3. Call center operations must be able to function at an adequate level to provide basic services. MTM will utilize remote call center locations if the corporate call center is compromised, and/or some staff may be set to work remotely.
4. Claims adjudication and claims reconciliation must maintain scheduled payment dates to rendering providers and transportation providers. These processes can be done with remote access.
5. Accounting is critical to ensure payments to rendering providers, transportation providers and employee payroll are met. Remote access will be utilized to perform these functions.
6. Other departments will continue their functions at basic service levels to maintain contractual obligations, and also serve as auxiliary resources for vital MTM services.

This policy is reviewed by the appropriate department director on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Information Technology **Date**

Corporate Procedure

Subject:	Security Badge Assignment and Proper Use	**Procedure No:**	300.003
Authorized By:	Director, IT	**Date:**	2/1/2013
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	MTM Corporate		

PURPOSE:
To ensure security access badges (hereafter referred to as "badge") are properly used and accounted for at all times in an effort to protect MTM staff and property.

POLICY:
N/A

RESPONSIBILITY:
MTM takes the following steps to ensure employees remain compliant with using their badges:

A. Each employee is issued a badge with designated access to the secured areas which apply to their job position and necessary duties.
B. The Information Technology (IT) department manages and tracks all badges issued.
C. Employees are not permitted to use another employee's badge.
D. An employee must swipe their badge when accessing all areas, even if they are following behind another employee who has already swiped their badge to obtain access, otherwise known as "tailgating."
E. In the event of a lost, stolen, or broken badge, the employee must immediately report it to their direct Supervisor and/or IT Security so the badge can be deactivated and a new badge can be issued.
F. If a new badge is required a $5.00 fee applies to replace the badge, holder, and reel/lanyard. There is no fee charged to replace badges damaged due to normal wear and tear.
G. Any fees charged to the employee for replacement badges will be deducted from the employee's first paycheck of the month. IT will submit a list to Accounting on/about the 25th of each month listing those employees that should be charged the $5.00 fee for the replacement of their badge; the list will contain those names affected from the previous

month (i.e., the June list given to Accounting will have the names being charged from May).

H. IT will provide each department with a designated number of temporary badges (based on the department size/number of staff). These temporary badges will be assigned to a member of the management team for the department.
I. The temporary badge may be provided to an employee who has forgotten their badge for one day. The employee must not use the temporary badge for multiple/consecutive days.
J. The designated management member will be held accountable for the temporary badges and must at all times maintain the badge log each time an employee uses a temporary badge.
K. Random departments may be audited from time to time to ensure the entire process is being followed appropriately.
L. If the designated management fails to properly utilize the badge log, they risk having their department's temporary badge deactivated by IT.

*Attachment A – Temporary Badge Log

This procedure is reviewed by the appropriate department head on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Director, Information Technology Date

Corporate Procedure

Subject:	Encounter Transmissions	**Procedure No.:**	312.001
Authorized By:	Chief Information Officer	**Date:**	05/01/2013
Department:	Information Technology	**Last Revised:**	5/1/2014
Applicability:	Information Technology		

PURPOSE:
The purpose of this procedure is to ensure the encounter transmission process adheres to all regulatory and HIPAA Standards for Electronic Data Interchange (EDI) transmission.

POLICY:
Policy 312-Encounter Transmissions

RESPONSIBILITY:

1. The MTM EDI team shall manage all data transmissions and protocols to ensure secure data integrity and accuracy in reporting.
    a. Check for Required Data to Create Encounters
        i. Member Data
        ii. Trip Data
        iii. Other (client specific)
    b. 5010 837P EDI Formatting Followed (general file formatting)
    c. Submitter ID (specific to the client)
    d. Receiver ID (specific to the client)
    e. Production/Test Indicator
    f. DCN Matching across applicable segments
2. Transactional datasets shall be managed in a secure data repository.
3. The EDI transmissions will be delivered in a timely and consistent manner according to client specific criteria.
4. The EDI file format shall follow standard HIPAA and state requirements.

Data provided by MTM to clients, provider and facilities or from clients, providers or facilities shall be transmitted through HIPAA compliant means to safeguard confidentiality. Depending on client's data transmission policies, secure electronic transmission, also knows as "transmission encryption," Secure File Transfer Protocol (SFTP) shall be utilized.

This procedure is reviewed by the appropriate department manager on an annual basis for appropriateness and effectiveness.

APPROVED BY:

_____ _____

Chief Information Officer Date

11.0 Glossary of Terms

Abuse: Practices that are inconsistent with sound fiscal or business practices and result in an unnecessary cost to the Medicaid program, or in reimbursement for services that were not performed.

Accident: Any mishap involving a subcontracted transportation provider's vehicle and a member. This includes, but not limited to a fender bender, blown tire, etc.

Action: The denial or limited authorization of a requested service, including the type or level of service; the reduction, suspension, or termination of a previously authorized service; the denial in whole or in part of payment for a service; or the failure of the member to act within established time requirements for service accessibility.

Additional Member: An eligible member beyond the first member transported by a transportation provider during the same trip to healthcare appointments.

Additional Stop: An additional stop (pick-up or drop-off point) other than the initial pick-up and drop-off points. Additional stops occur when multiple members are transported during a single trip or MTM approves an additional trip, i.e. pharmacy stop after a healthcare appointment.

Alternative Method of Transportation: If the most appropriate type of transportation for a member is not available, a different form may be used, i.e. mileage reimbursement in place of a transportation provider.

Ambulance: A vehicle for transporting the sick and injured that is equipped and staffed to provide medical care during transit.

Ambulatory: A person who can walk without the assistance of another person. The person may be using a device such as cane or walker. Ambulatory also includes a person who uses a wheelchair and is able to transfer from the chair to a vehicle.

Ancillary Services: Additional services provided such as parking, meals and lodging, also known as Prior Authorization services.

Appeal: Any written or oral communication by a member or his/her representative to MTM expressing dissatisfaction with the provision of transportation or any other transportation related service provided for under this contract.

Appropriate Method of Transportation: The least expensive mode of transportation that best meets the physical, medical, or behavioral circumstances of a member requiring transportation to a healthcare service.

Assistance: The acts required to physically help from within or into a building or from within or into the medical provider's site. Without this assistance it would be unsafe or impossible for the member to reach the vehicle or the medical provider's site. An employee of the transportation provider, the driver, or an additional person provides this assistance, which is beyond a door-to-door service.

Available Transportation: A public transportation system, transportation provider, organization, agency, or individual offering appropriate transportation services to a member who requires transportation.

Broker: An entity that recruits and contracts with transportation providers; performs payment administration, gate keeping, and verification of need; makes reservations and trip assignments; performs quality assurance and service improvement activities; provides administrative oversight; and reports on NEMT program activities.

Client: Refers to the customer contracted with MTM to handle the transportation benefit offered to their covered population.

Complaint: Any written or verbal expression of dissatisfaction about services, procedures, or functions of MTM which causes an intervention by MTM for the member and/or caller.

CSR: Refers to Customer Service Representative

Curb-to-Curb: The transportation provider picks up and drops off the member at the curb or outside of the building of the destination.

Door-to-Door: The transportation provider accompanies the member from the door of the pick-up point to the door of the destination.

Door-through-Door: The transportation provider accompanies the member from inside their place of residence into the office of the service provider because of some specified physical or mental impairment.

Driver Trip Log: A form filled out by drivers that records required information for each trip.

Emergency: A situation or medical condition (including labor and delivery) manifesting itself by acute symptoms of sufficient severity (including severe pain) such that the absence of immediate medical attention could result in seriously jeopardizing the member's health, impair bodily functions, or cause dysfunction of any bodily organ or part. Emergency transportation is not included in this contract.

Escort: Someone who must accompany a member to and from a medical appointment, i.e. family member or aide.

Follow-Up Treatment: Repeat visits for healthcare services, i.e. further tests based on an appointment.

Fraud: An intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to himself or some other person. It includes any act that constitutes fraud under applicable Federal or State law

Grievance: An expression of dissatisfaction about any matter. Possible subjects for complaints include, but are not limited to, aspects of interpersonal relationships such as rudeness of a transportation provider or MTM employee, or failure to respect the member's rights.

Incident: Any non-vehicular mishap involving a member while in the care of a MTM transportation provider. This includes, but not limited to the passenger falls while trying to enter the vehicle, a passenger falls while walking to the vehicle, etc.

Individual Transportation Provider: An individual who approved to transport members using a personal vehicle.

Level-of-Need (LON) Assessments: Medical assessments completed by the member's physician and an MTM Care Manager that determines the most appropriate, least costly mode of transportation for each member.

Medical Provider: Any business entity or individual providing one or more medical services to a member.

MTM Client: Any business entity for which MTM has agreed to provide transportation services.

MTM Passenger: The member who receives the transportation service.

MTM Provider: The contracted transportation provider performing transportation services.

Multi-Passenger Vehicle: A sedan or van type vehicle capable of carrying multiple passengers that is used to transport ambulatory patients who may require assistance.

NEMT (Non-Emergency Transportation): A program that offers non-emergency transportation services for members who have no other means of transportation, but need to secure necessary healthcare services with the nearest healthcare provider.

NEMT Trip: A one-way transportation service from the member's home to a place where a covered healthcare service will be provided to that member, a return trip home, or a trip from one covered medical service to another.

Network Providers: Transportation providers under contract with MTM.

Non-Ambulatory: A member who cannot walk without assistance and may be in a wheelchair or needs personal assistance.

Non-Emergency Ambulance Trip: A pre-arranged ambulance trip that is not responding to an emergency injury or illness. These services may be needed because a member requires medical care during transit, which an ambulance is equipped and staffed to provide. Ambulance service is not included in this contract.

No-Show: When a member fails to use an approved transportation service that is not cancelled, or when a transportation provider has not cancelled a scheduled trip but fails to complete the scheduled trip.

Private Transportation: Transportation in a vehicle owned by a member or a friend, relative, acquaintance, or other individual, provided the vehicle is not licensed for commercial carriage. Individual does not mean communities, companies, corporations, societies, or associations.

Quality Improvement/Assurance Program: The monitoring and evaluation program(s) established by MTM, based on MTM policies, federal and state laws and NCQA standards to ensure ongoing delivery of quality services and maintain compliance.

Round Trip: The dispatching of a vehicle to the member's pick-up point, transporting the member to a medical provider, and transporting the member back to the pick-up point.

Serious Accident/Incidents: Any report of death, allegation of abuse, neglect, serious physical injury, improper use of restraints, suicide attempt or threat and missing person.

Serious Complaint*:* Involves complaints such as those of sexual harassment, discrimination, threatening conversation/behavior, safe driving issues, etc.

Shared Ride/Multiload: A form of transportation in which the provider transports several members who have similar or close delivery destinations at the same time.

Special Populations: Includes dialysis, disabled or impaired individuals, the medically fragile members of Adult Day Healthcare, and certain other persons and must take into particular account the physical or medical condition of the rider following certain treatment or activity.

Substantial Complaint: A request for review of the denial or limited authorization of a requested transport; the reduction, suspension, or termination of a previously authorized transport; the denial, in whole or in part, of payment for a transport; the failure to provide transportation services in a timely manner; or the failure to act within the timeframes provided in the contract.

Transportation Provider Profile: A set of data describing each transportation provider's unique service abilities such as hours of operation, types of vehicles and related transportation services, and pricing structure.

Transportation Provider Service Agreement: The signed written contractual agreement between MTM and the provider of transportation services.

Unsubstantiated Complaint: A complaint that, after full investigation is completed, the transportation provider is found to be in compliance with MTM's Transportation Provider Guidelines.

Warm Transfer: Transferring a call from a member to their designated Health Plan, per member contract requirements. The Quality Service Representative (QSR) will stay on the line until they have reached a live person.

Waste: Over-utilization of services or other practices that result in unnecessary costs. Waste is generally not considered to be caused by criminally negligent actions but rather the misuse of resources.

Wheelchair (Paralift): A vehicle used exclusively for the transportation of non-ambulatory patients. Paralift transports individuals who require transport while sitting in a wheel chair.

Wheelchair Vans: A vehicle that has been designed with a drop floor, extended roof, and ramp or lift to transport disabled members who are in wheelchairs.