2015
Quality Management Program (QMP)

Medical Transportation Management, Inc. (MTM)

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Standardized Language

Throughout this entire document, the following two definitions will be used:

Client: Refers to an entity contracted with MTM to provide services based on designated contracted stipulations.

Member: Refers to the population served by MTM clients. Members are 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.

I. Purpose

The purpose of the Quality Management Program (QMP) is to provide an organized schedule of objective and systematic monitoring, measurement, reporting, and evaluation of MTM's services. Based upon results from this monitoring and evaluation, new processes are implemented and improvements are made based on actual findings from the previous year. The goal is to support MTM's mission of developing best practices in providing access to non-emergency medical care, medical program management, information management, and new product development.

URAC Accreditation

MTM became certified and accredited by URAC in March 2010. Becoming URAC accredited enables MTM to participate in a wide range of quality benchmarking programs and services and keep pace with the rapid changes in the healthcare system. Additionally, URAC accreditation provides a symbol of excellence for organizations to validate their commitment to quality and accountability.

In order to ensure continuing compliance with MTM's Utilization Review Accreditation Committee (URAC) accreditation, the focus of the QMP centers upon addressing opportunities for continued process improvements. This program is reviewed and updated by the Quality Management Committee (QMC) and approved by the Chief Executive Officer on an annual basis.

II. Scope

The annual review and renewal of the QMP builds upon the existing QMP. Program activities are reported to the QMC for analysis and directives on a quarterly basis. The following departments and their applicable functions are reviewed by the QMC:

- Network Management – Transportation provider management and compliance
- Customer Service Center – Call quality scores and contract compliance
- Care Management – Member utilization management
- Claims/Finance – Accuracy, compliance, and timeliness of payments
- Complaint, grievance, and member appeal management
- Fraud, waste, and abuse prevention, detection, and investigation
- Incident and accident management
- Satisfaction survey management

III. MTM's Mission, Vision, and Values

2015 marks MTM's 20th anniversary of removing community barriers. MTM has been a transportation industry leader for two decades and has an impressive track record of working with state and county governments, Medicaid and Medicare managed care organizations, transit agencies, third-party administrators, and healthcare providers to manage non-emergency medical transportation (NEMT). With a passion for providing high-quality service and building relationships, MTM's dedication to our stakeholders remains at the core of our business despite increasing changes in healthcare delivery.

20 years / removing community barriers

Mission Statement

MTM's mission is to partner with our clients in developing innovative solutions for accessing healthcare, increasing independence, and connecting to community resources in the most cost-effective manner. To achieve this, we leverage our core competencies in managing customer service operations and building provider networks.

Vision Statement

Communities without barriers

Workplace Values

Respect individuals

Collaborate to innovate

Deliver value

Align with clients

Act with integrity

removing barriers for individuals attempting to access healthcare and community services

IV. Goals and Objectives

MTM's QMP goals align with the "Three Aims" of the Centers of Medicare and Medicaid Services (CMS) Quality Strategy:

Better Health for the Population

MTM's goal is to ensure that members receive the necessary transportation services to ensure they are able to achieve and maintain better overall health and quality of life. MTM seeks to achieve this goal by:

- Ensuring adequate network coverage by establishing a robust network of transportation providers
- Providing access to appropriately staffed and fully trained customer service centers for each member scheduling service

Better Care for Individuals

MTM's goal is to ensure that members receive superior service from MTM and MTM's network of providers. MTM seeks to achieve this goal by:

- Managing and utilizing the feedback from MTM's comprehensive complaint/grievance and member appeals process
- Reviewing and implementing changes based on the various satisfaction survey campaigns MTM uses; member, client, and facility satisfaction surveys are used to gauge MTM's overall effectiveness

Lower Cost through Improvement

One of MTM's primary goals is to ensure that services are provided in a cost-effective manner. This reduces burden to the government and private health care organizations. MTM seeks to achieve this goal by:

- An aggressive approach to fraud, waste, and abuse prevention and detection
- Utilizing the most appropriate mode for each member and trip
- Contracting with providers at reasonable rates and strategically incentivizing providers to ensure the best quality for the best price

V. Performance Methodologies

The following methodologies are employed to achieve QMP objectives:

A. Customer Service Representative Oversight

MTM's Quality Service Evaluators have developed a quality program with specific criteria designed to work with our Interactive Intelligence Quality Management System database. The Customer Service Center Call Quality Scoring Guidelines are reviewed annually and are developed to include, at a minimum:

- Proper verification of a minimum of three pieces of Protected Health Information (PHI) from the caller before entering into conversation related to the member and/or the services they are requesting
- The tone, manner, and efficiency of the Customer Service Representative (CSR) during trip intake, including documentation of any special needs the member has which must be accommodated
- Recap of the entire trip with the caller to ensure accuracy

The Quality Service Evaluators complete the contractually required amount of call observations each month. The observation scores are used as an indicator of the overall performance of the CSR in the area of quality. The Interactive Intelligence Quality Management System database calculates the scores as evaluated by the Quality Service Evaluators on all components of the call intake process, including hard and soft skills, and compiles the CSR's overall score.

Quality Service Evaluators are responsible for sharing individual and overall results with Customer Service Center leadership for useful feedback, training, coaching, and performance improvement purposes. Additionally, Quality Service Evaluators, Quality Management (QM) leadership, and Customer Service Center leadership meet on a quarterly basis to review quality monitoring results, discuss trending, identify opportunities for improvement, and field any quality-related issues.

B. Transportation Provider Audits

The purpose of the transportation provider audit is to ensure transportation provider compliance with their contractual obligations to MTM. The MTM Field Inspector or MTM delegate completes transportation provider audits for contracted providers in MTM's network based on contractual guidelines. Initial audits are conducted prior to or within 90 days of the transportation provider's contract effective date.

C. Transportation Provider Monitoring

As MTM monitors the overall performance of transportation providers, MTM may place a transportation provider on a Performance Improvement Plan (PIP) to achieve compliance or improve performance. A PIP may be initiated for reasons including, but not limited to the following:

- Complaints
- Cancellations
- Vendor no shows
- General performance
- Compliance issues
- Potential fraud, waste, or abuse
- Field monitoring deficiencies

Failure to improve or achieve compliance by the conclusion of a PIP may result in liquidated damage assessments, suspension, and/or termination.

D. Transportation Provider Credentialing/Re-credentialing

The credentialing process ensures appropriate and complete information is collected and verified for all contracted transportation providers. The decision to include a transportation provider and/or an individual driver/attendant in the MTM network is based on a thorough review and evaluation of the approved credentials. Items examined include, but may not be limited to:

- State/federal exclusions lists containing the names and addresses of people which have been debarred from providing services to Medicare and/or Medicaid
    - Office of Inspector General (OIG)
    - Systems Award Management (SAM)
- Criminal background check
- DMV records
- Driver's license status
- Proof of insurance
- Any other appropriate sources which may confirm a driver's ability to provide high quality, safe transportation services

MTM utilizes an online, web-based portal to store credentialing information. The portal is a real-time resource which is available to the transportation providers 24 hours a day. The Network Management department approves or denies each element of the information for the transportation provider. This ensures credentialing is current. All credentials are reviewed and approved as indicated in each client contract.

E. Potential Fraud, Waste, and Abuse Monitoring

1. **Focus Audits for Transportation Providers**

   Periodic audits of transportation providers are conducted to determine if appropriate conduct and practices are being followed. Focus audits of transportation providers are completed for various reasons including, but not limited to:

   - Suspicion of fraud, waste, or abuse
   - Requests from a client
   - Requests from an MTM employee
   - Requests from MTM's Legal department
   - Requests from local, state, or federal authorities
   - Referrals from the Compliance Hotline

   Focus Audits may result in one or more of the following:

   - PIPs
   - Ongoing audits
   - Liquidated damage assessments
   - Suspension and/or termination

2. **Attendance Verification and/or Validation Checks**

   Attendance verification is conducted to detect potentially fraudulent activity. Pre- and post-attendance verification may be completed through various methods for the following trips:

   - Recurring trip requests (dialysis, chemotherapy, etc.)
   - Urgent trip requests
   - Trips not meeting client protocol or requiring client authorization verified and/or authorized by the client
   - Appointments for members displaying potentially fraudulent behavior

3. **Potential Member Fraud Alert Audits/Investigations**

   A member of the QM staff investigates all reported potential fraud alerts. Upon receipt of a potential fraud alert, investigation begins by acquiring all pertinent documentation. Call recordings, trip notes, follow-up calls, and claims information may be utilized to determine the legitimacy of each fraud alert. The QM staff member will categorize the potential fraud alert and indicate if MTM determines the alert to be valid or invalid. Potential fraud, waste, and abuse reports are provided to MTM clients in accordance with contractual requirements. MTM's General Counsel may also be consulted during investigation for input and/or recommendations for next steps.

F. Internal Audits

MTM's internal auditing process is designed to add value and improve operations. Its purpose is to accomplish MTM's objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of our corporate programs and departments. Internal audits will be scheduled and selected based on the following criteria:

- Client findings and/or recommendations from previous client audits
- QM findings and/or recommendations from previous audits
- Internal findings based on previous internal audits or projects
- Requests received by the various MTM operational departments; requests will be prioritized based on the following factors:
    - Contractual compliance
    - Potential risk to MTM
    - Overall impact to MTM
    - Potential cost-savings
    - Level of effort

Note: Due to the nature and purpose of internal audits, findings and recommendations are only disclosed to pertinent internal departments.

G. Training

With the ever changing world of training requirements, MTM has continued to evolve our training materials for employees and downstream/related entities. MTM utilizes a centralized training source for all staff trainings. Annually, there are standard assignments which must be completed by each staff member, including topics like Fraud, Waste and Abuse (FWA), HIPAA Compliance,

Cultural Competency, Confidentiality, etc. All MTM staff is trained on current HIPAA and FWA standards and regulations. MTM continues to enhance training to ensure ongoing compliance with client requirements, HIPAA best practices, and CMS regulations. Initial training takes place during new hire orientation and annual training is conducted thereafter. MTM makes training materials available to downstream/related entities (MTM transportation providers) via our website.

MTM provides appropriate training to ensure all staff members have the ability to address a diverse population with varying cultural, linguistic, and complex health needs. The goal is to provide all people contacting MTM, regardless of culture, race, ethnic background, religion, or disability, with a positive and professional experience. MTM's staff strives to make every client and member feel valued and respected.

H. Cultural Diversity and Acceptance Program

In addition to the required training listed above, MTM takes further steps to ensure we are in tune with the needs of culturally diverse populations; these steps include offering:

- Language assistance in a wide array of languages, both via MTM staff and the use of a language service if a particular language is not covered by an MTM staff member
- Assistance to those that may be hearing impaired using standard TTY services
- Information such as pamphlets, mailings, and other printed communications in multiple languages, depending upon the demographics of the area and client requirements
- Supplemental training to downstream/related entities so they have the appropriate knowledge base to provide the safest, highest quality service to a diverse membership

I. Satisfaction Surveys

MTM utilizes surveys for the purpose of identifying areas where there may be opportunities for improvement in order to increase the quality of care and services provided to members and clients.

1. **Member Satisfaction Surveys**

   To ensure members receive the highest quality of service, a statistically valid random sample of all members is selected for a telephone follow-up satisfaction survey. The survey includes evaluation of the intake process, driver and vehicle performance, and timeliness of the service. Member Satisfaction Surveys are reported on delegated monthly client summary reports.

2. **Client Satisfaction Surveys**

   Client Satisfaction Surveys are conducted as a method of maintaining excellence in delivery of services. Additionally, the survey is a tool to monitor MTM's response to client needs and concerns, and to identify areas needing improvement.

3. **Medical Facility Satisfaction Surveys**

   Medical Facility Satisfaction Surveys provide additional insight into MTM's integral role of members accessing healthcare. MTM not only strives to partner with transportation providers, clients, and members, but also understands the vital role of facility cooperation. MTM's Education, Training, and Outreach (ETO) teams are in regular contact with facilities to gauge the timeliness of transportation providers and the effectiveness of MTM's processes to reduce unnecessary burden to members. The Medical Facility Satisfaction Survey is an additional tool to monitor MTM's ability to provide effective delivery of transportation services and to accommodate the special needs of members attending the facility.

J. Complaints/Grievances Management

Complaints and grievances are managed by MTM's QM department as specified in client contracts. The purpose of the complaint and grievance process is to establish a mechanism and reporting system allowing MTM to address key issues and problems in an effort to improve quality of care and services. The process includes documentation, investigation, resolution, and reporting. Complaints and grievances are tracked and trended to identify potential issues of concern.

MTM offers a toll-free number through which any stakeholder can file a complaint or grievance. Complaints and grievances may also be filed in writing via mail, fax, e-mail, or the MTM website as dictated by the client contract. If the call is received after standard business hours, the caller has the option to leave a voice message and a member of the QM team will return the call the following business day.

All complaints and grievances are tracked from initial intake through resolution and reporting based on client requirements.

K. Member Appeals

Member appeals are managed by the QM department based on client contracts. Specific timeframes involving documentation, investigation, follow-up, and resolution are observed. MTM works closely with clients to ensure information is provided as needed. MTM understands the unique reporting requirements of our individual clients and develops client-specific appeals processes in order to meet those needs.

L. State Fair Hearings

Members and/or transportation providers may request a state fair hearing based on the client contract. This is a right given to the member and/or transportation provider by their state of residence. Members and transportation providers alike are given the appropriate contact information by MTM to request a state fair hearing. MTM may participate in such hearings if requested and/or required. The state of record has the final decision in the case of a state fair hearing.

M. Incident/Accident Reports

Incident/accident processes are in place to ensure all information is documented and addressed appropriately within the contractually required timeframes. MTM's QM department manages all incident/accident reports to ensure action, closure, and communication to the appropriate stakeholders. MTM's reporting system includes documentation of all incidents/accidents including, but not limited to, abuse by member, abuse by transportation provider, harassment, assault, injuries, and motor vehicle accidents.

Transportation providers are educated and contractually bound to notify MTM of any incident/accident, preferably immediately, but minimally within 24 hours. MTM staff members are educated to forward all calls reporting an incident/accident to the QM department. Stakeholders can also use the MTM website to report an incident/accident. MTM's QM department escalates reports to designated MTM management staff for review, recommendation, and resolution. Incidents/accidents of a more serious nature are escalated to MTM's General Counsel and designated executive staff. Full investigation and closure is provided to MTM's client within 30 days of the reported incident/accident.

Definitions:

Accident: Any mishap involving a subcontracted transportation provider's vehicle while transporting a member.

Incident: Any non-vehicular mishap involving a member while in the care of an MTM transportation provider.

Serious Incident/Accident: Any report of death, allegation of abuse or neglect, serious physical injury, improper use of restraints, suicide attempt, threat of suicide, and/or missing person.

All incidents/accidents are fully investigated internally and information from all parties involved is gathered, including the police report if applicable.

VI. Process for QMP and Policy Approval

Policies are necessary to:

- Document business processes
- Assign personnel responsibilities
- Describe departmental operations
- Promote uniformity in executing and recording metrics

QM maintains 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 an annual basis, or more frequently as needed, departmental policies are evaluated and approved by the QMC. The President and CEO, executive management, and managing staff sign policies. Management staff is responsible for advising their staff regarding new and/or revised policies and procedures.

MTM adheres to the following practices for policies and procedures:

- Maintain accurate, complete, and current policies and procedures
- Review and approve all policies and procedures at least annually and revise and/or update as needed
- Communicate significant changes to all affected personnel immediately to ensure they are aware of any revisions to their daily duties and responsibilities; in the event there are changes in personnel, documented policies and procedures will facilitate training and provide guidelines for the respective positions
- Comply with applicable HIPAA and URAC standards
- Post all policies on the electronic directory for employee access

Reviews and Approvals

When a process is conducted within a department, there is:

- Another level of review and approval performed by the QMC
- Documentation to verify a review and approval were completed
- Electronic approval available to enable rapid documentation of approvals
- Assurance those approval alerts and escalations are within the workflow
- Approval documented in a repository to ensure compliance with internal and external audits

Figure 1: Policy and Procedure Development.

VII. MTM Committee Infrastructure

Quality Management Committee (QMC)

The QMC is a committee which is granted authority by MTM's Board of Directors, President and CEO, and executive management staff. The committee consists of the following members:

Membership of the QMC Committee:
Director, Quality Management – *Chair*
Vice President, Finance
Vice President, Marketing
Vice President, Operations
Director, Account Services
Director, Call Center Operations
Director, IT Infrastructure

The QMC meets quarterly and is responsible for:

- Providing ongoing reporting to MTM's Board of Directors
- Maintaining minutes of all committee meetings
- Providing guidance to MTM staff on quality management priorities and projects
- Approval of all quality improvement projects
- Monitoring quality improvement goals
- Evaluating the QMP annually
- Informing department staff of QMC activities/results

Transportation Provider Advisory Committee Meetings

Based on client requirements, MTM developed a Transportation Provider Advisory Committee (PAC) meeting structure (also known as stakeholder meetings) in certain areas. Meetings are held with MTM, per client contractual obligations, or as needed. All transportation providers are polled during the initial provider meetings for interest in the committee. MTM then includes transportation providers of all sizes and regions of the state for fair and accurate representation. The purpose of these meetings is to increase communication with transportation providers in the

respective areas and for the group to act as a liaison between the transportation providers and MTM. The PAC meeting provides a forum for transportation providers to present ideas, concerns, and suggestions to MTM. In addition, it provides MTM a forum to introduce new processes or strategies. Each meeting has an agenda and notes are documented for tracking purposes.

MTM Members of the Advisory Committee:
Program Director
Manager, Network Operations
Network Representative

VIII. Quality Improvement Program (QIP)

MTM's QMC addresses priority program-related issues in connection with key indicators which require further study and intervention. MTM conducts a minimum of two QIPs per year. QIPs exemplify the process of continuous quality improvement, allowing MTM to refine, improve, and maintain quality. The committee utilizes survey results, outcome results, and other operational reports to identify opportunities for quality improvement projects. Each QIP includes the following:

- Reports of changes in implementation strategies together with a description of why strategies were changed
- Notes regarding the onset and end dates of the project
- Decision as to whether or not MTM will continue to periodically measure performance after project completion

Note: MTM's QIPs answer each identifier within URAC version 3.0, CORE 23.

Project results are disseminated to MTM departments, board members, and applicable clients as deemed appropriate by MTM.

IX. Indicators of Care and Service

MTM's QMC monitors various operational indicators of care and service. MTM determines Key Performance Indicators (KPIs) based on client contracts and overall impact to various stakeholders.

Client Reporting

Monthly Client Summary Reports are available to designated clients that provide an in-depth review of each client's membership and various data points relating to the transportation benefit administrated by MTM. The reports include metrics pertaining to the following:

- Member utilization
- Customer Service Center phone statistics
- Complaint management
- Modes of transportation
- Trips reasons
- Member Satisfaction Survey results

Internal Reporting

Internal reports are provided to the QMC members and various operational departments to review various KPIs as determined by the QM department and executive management staff. As these reports encompass data and statistics across multiple plans, reports remain internal and are utilized to identify potential areas for opportunity and improvement across the entire organization.

X. Evaluation and Accountability to the Governing Body

The QMP is accountable to the governing body of MTM, which includes both the Executive Management team and the Board of Directors. Achievements of the QMP are reflected in results of audits and overall improvement of MTM services as a whole. Several parameters indicate the success of the QMP's efforts in improving quality of care and services:

- Significant reduction in costs
- Increase in member and client satisfaction
- Development of sustainable quality of care and services
- Increases in MTM's book of business
- Increased collaboration and commitment to MTM's mission by personnel

Summary

The QMP is built upon the monitoring and evaluation process. Modifications within the QMP include but are not limited to:

- Placing emphasis on leadership's role in improving quality
- Expanding the scope of assessment and improvement activities
- Utilizing other sources for feedback such as community and client responses to surveys
- Organizing assessment and improvement activities around services, with specific attention to how the member, client, and transportation provider relationships can be improved
- Emphasizing continuous improvement in addition to resolving identified problems
- Maintaining quality improvement over time

Note: MTM reserves the right to make adjustments to the QMP to best meet the needs of clients, members, transportation providers, and MTM.

Approved: _____ 2/13/2015

Director, Quality Management — Date

Approved: _____ 2/13/2015

VP, Operations — Date

Approved: _____ 2/13/2015

President/CEO — Date