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Secretary Dennis Smith,

Aging & Disability
Professional Assn. of WI

American United Tax
Services

Cooperative Network

Greater WI Agency on
Aging Resources

Phoenix Transportation

Union Cab of Madison
Cooperative

WI Assn. of Mobility
Managers

WI Coalition of
Independent Living
Centers

WI Assn. of Taxicab
Owners

After the news about LogistiCare's termination of the NEMT contract, a group of experienced stakeholders and stakeholder organizations met to discuss changes to the RFP to strengthen the contract, provide improved oversight, and increase cost savings. The group discussed the following suggestions and would like DHS to respond with proposed changes to the RFP.

- Remove language in the RFP that prohibits WI companies or cooperatives from being eligible to bid on this project.
- Allow for regional brokers.
- Allow sub-contracting to regional entities if regional brokerage is not possible.
- Create an external complaint and grievance process including an Ombudsman; not only for members, but also for providers, to handle service and payment disputes.
- Enforce the penalties in the contract as required for poor performance.
- Mandate an advisory council that has oversight powers, and whose meetings are held according to open meeting requirements.
- Include public disclosure of the provider network, contract terms and standards, and advisory council activities.
- Change the reimbursement to the broker from a per member per month (PMPM) rate to a fee- for-service for rides with possible capitation rate for administrative costs.
- Require an efficient and expeditious ride request system.
- Make it clear in the RFP who is to be served by this contract and for what trip purposes (eg., more specificity is needed about mental health patients, children, veterans and others, as well as eligible trip purposes.)
- Clearer language is needed with regard to ambulance and nursing home services, as well as hospital discharges.

- Levels of service should be addressed to include those who need more than curb-to-curb service.
- Allow providers input on delivery service standards including whether exceptions to these are appropriate and needed in their area.
- Make provider and driver requirements, certifications and insurance, appropriate to the level of service and mode of transportation provided (eg., don't make volunteer drivers take wheelchair lift training even though they will not drive a lift vehicle). Allow for input on training requirements from experienced WI organizations.
- Data management and software system requirements need to be specified. Many of the problems with the system stem from inaccurate data exchange.
- Mandate a fair compensation rate to providers for NEMT transportation that is appropriate for the region and level of service.
- Ensure providers are paid in a timely fashion by creating and enforcing penalties for lack of timeliness. Many providers are small and delay of payment jeopardizes their ability to remain a viable business.
- Give the broker and providers the ability to deal with cost of client no-shows.
- Create process for consumers to be reimbursed for expenditures related to obtaining transportation in the event of broker error.
- Hold the broker harmless for incorrect data provided by DHS.
- Ride coordination should be looked at favorably in scoring bids, as well as ability to work successfully with public transit utilities.
- If contractors terminate the contract early, they should be prevented from rebidding on future contracts.

The NEMT Alliance recommends that tribal governments be consulted individually and potentially excluded from the contract. There may be advantages to the state of Wisconsin to honor Tribes as sovereign governments and to work with the federal funding source to achieve 100% federal matching assistance (FMAP) funds. Tribes have the right of self-determination and allowing Tribes to manage their own Medicaid NEMT would be advantageous to Tribes as well as all citizens of the state of Wisconsin. Consideration should also be given for a revision to the RFP to provide for dedicated staff at either the Department and/or the next broker to make sure these provisions are implemented. The replacement brokerage system should provide services to Tribal communities in a culturally competent fashion as well as build the capacity for Tribal transportation facilities to provide services to Tribal members and assure that the State of Wisconsin can claim 100% federal funding for NEMT.

The NEMT Alliance is concerned about this RFP not only because it involves significant state taxpayer dollars, but has been seen to affect jobs and economic development throughout the transportation provider network. Most of all, we are concerned about members who rely on this transportation system.

We are available to meet with DHS staff to discuss these suggestions and answer any questions and share information from those who work daily in the NEMT system.

Norah Cashin, President

WI Assn. of Mobility Managers

On Behalf of the NEMT Alliance

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Co-signers:

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American United Taxi Services
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WI Coalition of Independent Living Centers
WI Assn. of Taxicab Owners
Center for Independent Living of Western WI
Independent Living Council of WI
Midstate Independent Living Consultants
North Country Independent Living
Options for Independent Living
Comm-UNITY Voices
Milwaukee County Commission on Aging
Paul Bittorf, Union Cab President
Red Cliff Band of Lake Superior Chippewa
Specialized Medical Vehicle SMV Association
Survival Coalition of WI Disability Coalition
University of WI – Milwaukee, Center for Transportation
Wisconsin Counties Association
WI Urban & Rural Transit Association