

Non-Medical Waiver Transportation

Ohio Department of Developmental Disabilities

Jeremy Cunningham, FSA, MAAA, Principal and Consulting Actuary
Gwyn Volk, Senior Health Care Consultant

OCTOBER 20, 2023



Agenda

- Summary of NMT Provider Survey
- National Perspective: Non-Emergency Medical Transportation Approaches
- Fee-for-Service Payment Rate Development Considerations
- State Example Approaches
- Next Steps

Background and Scope of Project

Effective 7/16/23, DODD updated its Non-Medical Transportation Rule to clarify the definition of Commercial Transportation

Commercial Transportation is defined as: *Transportation provided by a public bus transit system, a public light rail transit system, or a taxicab that: (a) Transports passengers in accordance with an established fare schedule; and (b) Has auditable records demonstrating that the transportation provided is available to, and used primarily by, the general public (i.e., not solely persons who receive services and supports for persons who are aged, blind, or disabled). (5123-9-18(B)(4))*

The Rule creates a one-year transition period to allow providers who do not meet the above definition but who are transporting individuals to competitive integrated employment (5123-9-18(J)(2)) while we work to create a new service and rate to accommodate this transportation need.

Non-Emergency Transportation (NMT) Project Timeline

Task	Target Dates
NMT Landscape and Provider Feedback from Survey	Today
Preliminary Rate Model Framework	December 1, 2023 (via Zoom)
Draft Rate Meeting	Early January 2024
Final Rates	February 1, 2024

Summary of NMT Provider Survey

Provider Survey Overview

Purpose: Collect provider information to understand costs and variables associated with the usual and customary rate (UCR) methodology for providing Non-Medical Transportation to Competitive Integrated Employment (CIE). This information will assist in establishing a payment rate that is effective July 1, 2024.

Survey Status:

- Released: October 6th, 2023
- Due: October 13th, 2023
- Number of surveys received: Six

Provider Survey Feedback Themes

Methodology description

Transportation providers surveyed report various approaches to rate setting methodology, including:

- Per trip or per mile (current fee schedule)
- Base trip cost plus per mile
- Proprietary methodologies
- Market research

Types of vehicles and impact to UCR

- Respondents generally had variety of vehicles, indicating that vehicle type is based on needs of the participant
- 4 providers indicated that rates do not vary by vehicle type

Consideration for longer trips

- Approaches consider increased mileage associated with longer trips to cover vehicle related costs
- Increased staff time
- Longer trips typically are single riders

Impact to UCR for attendant in vehicle

Majority of respondents indicated:

- Additional attendants are not typically required
- If an additional person was required, this would need to be considered

UCR methodology reflecting shared rides

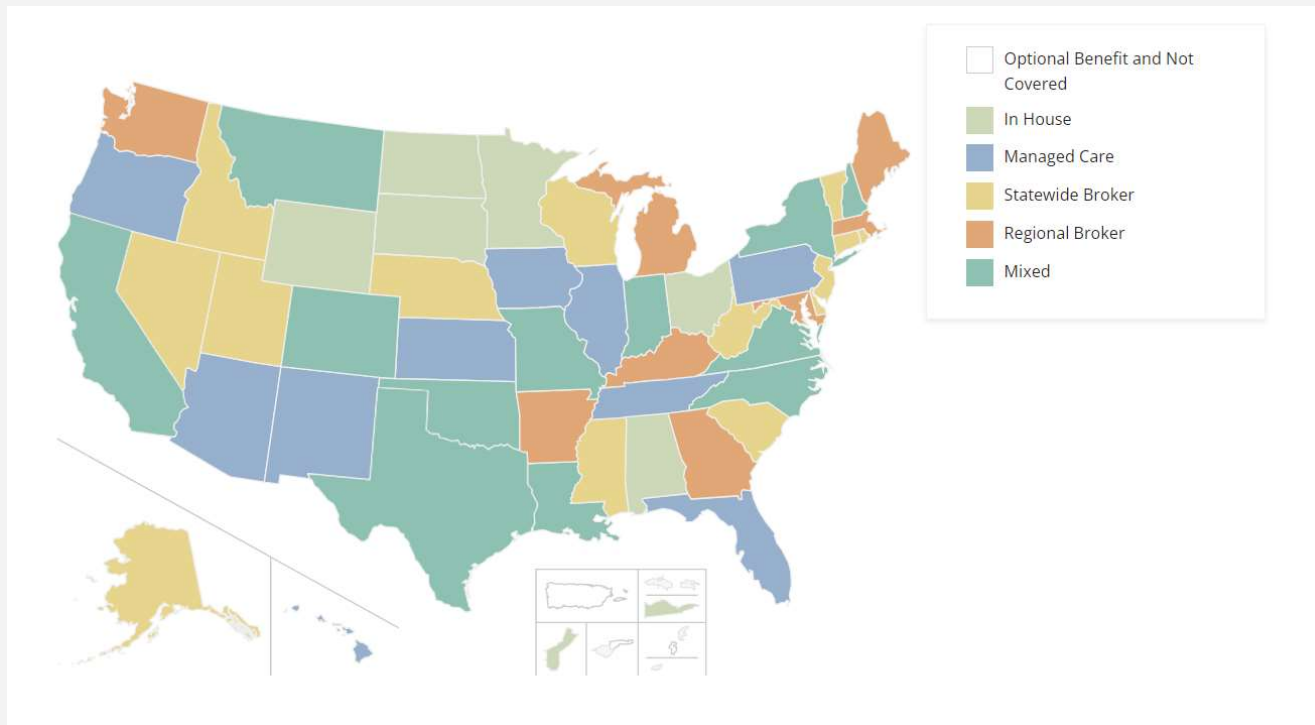
- Majority of respondents indicated shared rides are limited
- One provider noted pro-rating when sharing rides
- Shared rides sometimes occur because of group employment

Other cost impact considerations:

- Vehicle maintenance, repairs, insurance, and fuel
- Staff time, including unloaded time, wait time
- “No-show” consumers
- Time of day (late night, early morning, holidays)
- Dispatch service
- Administrative costs

National Perspective: Non-Emergency Medical Transportation Approaches

Nationwide Approaches for Non-Emergency Medical Transportation



The majority of states are using managed care or brokers when paying for non-emergency medical transportation.

Source: National Conference of State Legislatures. February 13, 2023. Nonemergency Medical Transportation. Accessed Online: <https://www.ncsl.org/health/nonemergency-medical-transportation-nem#:~:text=In%20Minnesota%2C%20NEMT%20services%20are%20provided%20as%20one-way,transit%20passes%20for%20Medicaid%20recipients%20for%20NEMT%20needs>

Fee-for-Service Payment Rate Development Considerations

Fee-for-Service Payment Rate Development Considerations

<p>Overall structure, for example:</p> <ul style="list-style-type: none"> • Base rate (flat rate paid to provider for each trip leg) + per mile rate • Payment rate varying by mileage band 	<p>Provider type</p> <ul style="list-style-type: none"> • Agency • Individual provider • Individual with vested interest 	<p>Ambulatory versus non-ambulatory service</p> <ul style="list-style-type: none"> • Vehicle type – with or without lift or ramp 	<p>Shared rides versus one-on-one rides</p> <ul style="list-style-type: none"> • A rider add-on has the potential to incentivize providers to deliver shared rides.
<p>Wait time and unloaded time/miles</p> <ul style="list-style-type: none"> • Typically built into the payment rate 	<p>No shows/absenteeism</p> <ul style="list-style-type: none"> • Increases non-productive time for drivers 	<p>Staffing for rate buildup</p> <ul style="list-style-type: none"> • Wages for drivers, aides/attendants, dispatcher 	<p>Geographic differences beyond mileage</p> <ul style="list-style-type: none"> • Example: Wage differences

State Examples

Colorado Developmental Disabilities Waiver

Service Description	Proc Code	Mod #1	Mod #2	Mod #3	Mod #4	Rate Effective 01/01/2023	Rate Effective 07/01/2023	Unit Value	Comments
Non-Medical Transportation, Outside Denver County									
Maximum of 508 units (trips) per Service Plan year (all mileage bands including public conveyance).									
Mileage Band 1 (0-10 Miles), Outside Denver County	T2003	U3				\$ 9.64	\$ 12.46	1 Trip	
Mileage Band 2 (11-20 Miles), Outside Denver County	T2003	U3	22			\$ 14.38	\$ 23.28	1 Trip	
Mileage Band 3 (Over 20 Miles), Outside Denver County	T2003	U3	TF			\$ 21.91	\$ 31.67	1 Trip	
Non-Medical Transportation, Denver County									
Maximum of 508 units (trips) per Service Plan year (all mileage bands including public conveyance).									
Mileage Band 1 (0-10 Miles)	T2003	U3				-	\$ 13.22	1 Trip	Effective July 1, 2023
Mileage Band 2 (11-20 Miles)	T2003	U3	22			-	\$ 24.62	1 Trip	
Mileage Band 3 (Over 20 Miles)	T2003	U3	TF			-	\$ 33.42	1 Trip	

Payment rate varies based on:

- Geographic location
- Mileage band

Source: Colorado Department of Health Care Policy and Financing. June 1, 2023. Home and Community Based Services: Developmental Disabilities. Accessed online: <https://hcpf.colorado.gov/sites/hcpf/files/DD%20SLS%20CES%20July%202023-2024%20Rate%20Schedules%20v1.2.pdf>

Louisiana Non-Emergency Medical Transportation

Procedure Code	Service Description	Pickup Rate
T2003	Non-emergency transportation encounter/trip	\$13.50* + \$1.10/mile
A0130	Non-emergency transportation wheelchair van	\$21.50* + \$1.30/mile
A0090	Non-emergency transportation per mile – vehicle provided by individual (family member, self, neighbor) with vested interest	\$0.36/mile

*Base rate is applicable to each leg of the trip

† Mileage calculations begin at 0 miles

Payment rate varies based on:

- Base rate and mileage rate
- Type of vehicle
- Agency versus vehicle provided by individual

Source: Louisiana Department of Health. January 1, 2022. Louisiana Non-Emergency Transportation (NEMT) Rates. Accessed online: https://www.lamedicaid.com/provweb1/fee_schedules/NEMT_RATES.pdf

Pennsylvania Adult Autism Waiver

Payment rate varies based on three mileage bands.

Service Name	Unit of Service	Procedure Code	Statewide Fee
Transportation Trip	Zone 1 (greater than 0 and up to 10 miles)	W7274	\$17.85
	Zone 2 (greater than 10 miles and up to 30 miles)	W7275	\$32.14
	Zone 3 (over 30 miles)	W7276	\$36.51

Source: Pennsylvania Department of Health and Human Services. October 1, 2021. Fee Schedule Rates for Adult Autism Waiver Services. Accessed online: <https://www.dhs.pa.gov/Services/Disabilities-Aging/Documents/Adult%20Autism%20Waiver/Proposed%20Fee520Schedule%20and%20Department%20Established%20Fees%20Rate%20Table.pdf>

Example of Transportation Rate Model Components – Pennsylvania

Wages and Employee Related Expenses

- Direct Care Wages – Drivers and Aides
- Other Program Staff Wages – Dispatcher
- Employee related expenses – health insurance and other benefits, federal and state withholdings
- Paid time off
- Training

Additional Assumptions

- Full time / part time staff split
- Productivity: number of trips per hour
- Productivity: Absentee factor
- Staffing ratios: Dispatcher to driver, aide to recipient
- Vehicle lease / depreciation
- Insurance
- Vehicle repairs and maintenance
- Fuel
- Administration percentage

Source: Pennsylvania Department of Health and Human Services. Transportation Trip Assumptions Log. Accessed online:
https://www.dhs.pa.gov/providers/Providers/Documents/ODP/Public%20Notices%20Related%20to%20Rates/ODP%20FY%2018%2019%20Trans%20Trip%20MRWG_Assumptions%20Log_080218.pdf

Next Steps

Next Steps

- Develop preliminary rate model framework for next meeting
- Additional feedback from today's meeting can be sent to Milliman via email:
OH.DODD@milliman.com



Thank you

Limitations

The information contained in this presentation has been prepared for the Ohio Department of Developmental Disabilities (DODD).

This presentation is intended to facilitate discussions with providers during an October 20, 2023 stakeholder meeting regarding DODD HCBS payment rates and service delivery and is not considered complete without oral comment. This presentation should not be used for any other purpose. The contents of this presentation are not intended to represent a legal or professional opinion or interpretation on any matters.

No portion of this presentation may be provided to third parties without Milliman's prior written consent. In the event such consent is provided, this presentation must be provided in its entirety.

Milliman makes no representations or warranties regarding the contents of this document to third parties. Similarly, third parties are instructed that they are to place no reliance upon this information prepared for DODD by Milliman that would result in the creation of any duty or liability under any theory of law by Milliman or its employees to third parties.