



Tennessee Medicaid NEMT Credentialing Pilot

Fall 2022 Whitepaper

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Summary

In an act of extraordinary cooperation, collaborators and competitors from across the Non-Emergency Medical Transportation (NEMT) industry adopted a shared vision for enhanced compliance practices, launched a credentialing improvement program, and demonstrated the program's effectiveness.

The processes and tools utilized in the Tennessee Medicaid NEMT Credentialing Pilot decreased redundant compliance tasks by 75%-86% and reduced credential handling by 95%-97%. Audits traditionally performed over many hours, and including only samples of credentials, were completed in an average of 16.6 seconds, and covered expanded collections of driver, vehicle, and organizational credentials. Further, 100% of the credentials shared between partners were automatically reviewed and tested for compliance prior to submission, eliminating the back-and-forth commonly experienced between partners as they work to ensure credentialing requirements are fulfilled.



17 Seconds
Average Audit Timeline

75%

Decrease in Redundant
Compliance Tasks

95%

Decrease in
Credential Handling

The NEMT industry is changing. It is the fastest growing segment within the medical transportation industry which is expected to grow by \$7.6 billion over the next five years¹.

The industry is feeling the effects of this growth in the form of escalating administrative workloads, resource shortages, and quality issues. Increased scrutiny from regulators has also uncovered extensive compliance deficiencies that call into question the effectiveness of NEMT program integrity practices².

The Tennessee Medicaid NEMT Credentialing Pilot was organized to test new credentialing processes and tools designed to address the compliance pressures facing the industry. In a testament to the NEMT leadership in Tennessee, the Medicaid



¹ Zion Market Research. 2022. U.S. Healthcare Transportation Services Market. <https://www.zionmarketresearch.com/report/the-us-healthcare-transportation-services-market>

² Kelly, C. 2021. Compliance Issues for NEMT Providers. NEMTAC Conference, September 2021, Scottsdale, Arizona.

NEMT regulator, all three managed care organizations, both brokers, and a cadre of innovation-minded transportation providers all joined together to champion the pilot.

Over the course of nine months, the pilot participants digitized credentials, completed proactive compliance checks, shared credentials with partners, prepared reports, and completed audits. They utilized network credentialing strategies and NEMTCredEx, a network collaboration tool powered by a blockchain-enabled digital exchange.

Beyond the tactical results outlined above, the program succeeded in:



- Improving overall compliance
- Improving process efficiency
- Improving credentials quality and reliability
- Promoting industry best-practices and standards
- Combating fraud, waste, and abuse
- Enabling comprehensive program integrity tools

While Tennessee is leading the nation with its pilot work, it is not alone in championing NEMT credentialing innovations. Over 50 transportation providers, brokers, payors, and regulators across 25 states are in various stages of launching credentialing improvement programs and demonstrating that this solution can be a transformative force in the NEMT industry.

The following sections are a detailed account of how NEMT leaders came together to address a critical issue facing the industry and successfully developed a solution for the common good.

**Redundant tasks that took hours
were completed in minutes**

NEMT Industry Background

Non-Emergency Medical Transportation (NEMT) is a type of ride service for individuals needing medical care or related support who are unable to access appropriate transportation through other means. This includes individuals that do not have a working vehicle or driver's license, have a physical or mental disability, or are unable to travel or wait alone for a ride.

Credentialing Requirements

NEMT credentialing consists of the collection, review, verification, audit, and monitoring of credentials that represent the qualifications of NEMT organizations, drivers, and vehicles. Examples of NEMT credentials include drivers' licenses, training certificates, background checks, motor vehicle records, exclusions monitoring, vehicle registrations and inspections, and insurance coverages.

NEMT credentialing requirements are commonly set by government agencies. These requirements are often expanded by organizations responsible for managing NEMT programs in a given jurisdiction. While there is generally agreement on the types of credentials that are relevant to NEMT, the scope of information collected, documentation styles, validation standards, and evaluation processes vary greatly across the country.



The Non-Emergency Medical Transportation Accreditation Commission (NEMTAC) helps bring clarity and consistency to credentialing by promulgating recommended standards as the American National Standards Institute (ANSI) standards developer for NEMT. NEMTAC's Compliance & Regulatory Advisory Board also helps evaluate and recommend best practices in addition to identifying industry priorities with the potential to improve NEMT in our communities.

The credentialing process begins with independent drivers and transportation providers that render NEMT services. They must compile credentials that prove their qualifications, competency, operational legitimacy, regulatory authorization, and safety record. These credentials are evaluated, packaged, and submitted to the organizations responsible for overseeing and funding the NEMT service. These organizations often include brokers, managed care organizations, and regulatory bodies. Upon receipt, these organizations are responsible for examining the credentials, further verifying their accuracy, and auditing the credentials to ensure compliance with governing standards.

NEMT credentialing is a repetitive and ongoing process because **every** organization involved in service delivery (e.g., transportation provider, broker, payor, and regulator) must review organizational, driver, and vehicle credentials even though other organizations

involved in the service delivery have already done this work. Furthermore, many credentials expire or require periodic reverification. The qualifications of drivers and vehicles can change daily and impact an NEMT organization's compliance status so credentials must be continuously managed to ensure eligibility.

Failure to do so can result in driver shortages, provider suspensions, lost revenue, penalties, loss of contracts, government sanctions, and in some cases criminal liability.



\$12 billion
NEMT Industry

6.2%

Medicaid Growth Rate

17%

Medicare Advantage
NEMT Benefits Growth

Industry Growth

NEMT is a \$12 billion industry served by 17,000 transportation providers who complete over 400 million trips per year. The industry is experiencing material growth, which will likely continue.

The Consolidated Appropriations Act of 2021³ requires states to provide NEMT services to Medicaid beneficiaries. There are 68 million Americans enrolled in Medicaid and the program is growing by 6.2% per year. Medicare Advantage plans are experiencing 17% growth in NEMT benefits⁴ and 51% of all seniors are expected to enroll in a Medicare Advantage plan by 2030.

NEMT's role in enabling overall health and wellness is also likely to drive growth. Access to effective transportation and its impact on overall health outcomes is an increasingly popular area of study⁵. Social determinants of health are re-shaping how healthcare is defined and 80% of Americans believe reliable transportation is nearly as important as access to doctors and medication⁶. Addressing transportation gaps as a function of health outcomes will only increase demand for NEMT services.

Mounting Expectations

Increased scrutiny and demands for more sophisticated compliance programs have followed NEMT growth. There are clear expectations that NEMT organizations demonstrate effective program safeguards and financial stewardship.

³ Consolidated Appropriations Act, 2021. Public Law 116-260, 12/27/2020, <https://www.congress.gov/116/plaws/publ260/PLAW-116publ260.pdf>.

⁴ Medical Transportation Access Coalition. 2021. NEMT Policy Challenges and Opportunities in Uncertain Times. NEMTAC Conference, September 2021, Scottsdale Arizona.

⁵ Heath, S. 2018. What is Non-Emergency Medical Transportation, Patient Access? Patient Engagement HIT. <https://patientengagementhit.com/news/what-is-non-emergency-medical-transportation-patient-access>

⁶ Kaiser Permanente. 2019. Social Needs in America. <https://about.kaiserpermanente.org/content/dam/internet/kp/comms/import/uploads/2019/06/KP-Social-Needs-Survey-Key-Findings.pdf>

The Office of Inspector General (OIG) examines state Medicaid NEMT programs and consistently finds high rates of inadequately documented driver qualifications and vehicle records. These credentialing shortcomings were present in hundreds of thousands of NEMT rides and contributed to millions of dollars in inappropriate Medicaid benefits across the audit samples. The OIG concluded that NEMT services are vulnerable to fraud and suffer from insufficient oversight and monitoring⁷.



Mounting evidence of compliance shortcomings have the Government Accountability Office (GAO) studying fraud and abuse prevention, improper payments, investigation and enforcement actions, and trends in NEMT. The goal is to identify new safeguards and risk management strategies for NEMT programs⁶.



Demand for improved NEMT compliance programs is further illustrated by the Center for Medicare & Medicaid Services (CMS) holding listening sessions in March and April 2022 focused on program integrity, billing concerns, documentation and data requirements of NEMT providers, and coordination between brokers, managed care organizations, and transportation providers⁸.

While NEMT administrative practices (e.g., partner coordination, credentialing, billing, operations enablement, quality assurance, etc.) previously met expectations, industry maturation has created a gap between current practices and the tools, processes, and collaboration needed to rigorously manage this growing industry. Growth increases the burden placed on NEMT organizations as they demonstrate that their offerings are safe, compliant, and high-quality because many of these administrative tasks are manual, redundant, and lack standardization. New program integrity strategies are needed for NEMT administrative capabilities to meet established and growing compliance expectations.

⁷ Kelly, C. 2021. Compliance Issues for NEMT Providers. NEMTAC Conference, September 2021, Scottsdale, Arizona.

⁸ CMS. 2022. Upcoming Non-Emergency Medical Transportation Listening Sessions. <https://www.medicare.gov/about-us/messages/132991>.

Vision for Improved NEMT Credentialing

The NEMT industry has a problem-solving culture and strong leaders who are diligent in protecting the communities they serve, their employees, and the hard-earned tradesmanship utilized in transporting vulnerable populations.

Call To Action

Frustrations grew among these leaders as bad actors from across the NEMT industry adopted harmful and unethical practices, including:

1. Falsifying credentials to avoid failing compliance checks
2. Delivering NEMT services using drivers and/or vehicles that lacked required credentials
3. Utilizing haphazard credentialing practices to diminish the usefulness of quality measurements in evaluating performance
4. Falsifying ride logs and claims
5. Leveraging artificially low administrative expenses and artificially large driver rosters to offer lowest-cost NEMT services

Confirmation of these practices resulted in a reputation for fraud, waste, and abuse that did not sit well with the ethical and hard-working majority of NEMT organizations.

A cadre of visionary NEMT leaders decided to help the industry meet heightened compliance expectations and shed its reputation concerns. They identified the following priorities in addressing the industry's compliance and fraud issues:

A. Reduce Credentialing Inefficiencies

NEMT credentialing tasks are often manual and redundant. Organizing, reviewing, sharing, coordinating, reconciling, and auditing this information is time consuming and resource intensive.

Tools and processes that bring efficiency and scalability to credentialing enable more impactful compliance programs. It is a priority among NEMT organizations to reduce the percentage of time used "credential chasing" and increase focus on credential evaluation. Realizing improvements in credentialing efficiency, organizations can more effectively fulfill the true purpose of credentialing— ensuring quality services and managing risk— rather than paper shuffling.

B. Improve Overall Compliance & Quality

Commonly, NEMT credentials are paper documents or electronic images of the paper documents. It is easy to determine if a document is present, but it is hard to determine if a credential meets compliance standards. This is especially true when evaluating credentials against the disparate requirements held by an organization's many partners. The process is further complicated by the many delivery, review, and reconciliation processes an organization must support in order to maintain compliance with their partners.

Digitally capturing the detailed content of credentials and electronically examining those details in accordance with the diverse requirements that govern NEMT credentialing improves quality and compliance.

Rapidly and automatically organizing and evaluating credentials would make gauging compliance easier. As a result, NEMT organizations could proactively ensure compliance and improve overall credentialing process effectiveness.

C. Create Barriers to Fraud, Waste, & Abuse

Changing the content of a credential prior to evaluation and audit is an opportunity for fraud in NEMT credentialing. Additionally, the sheer volume of credentials data makes it hard to analyze at scale and is therefore difficult to utilize for identifying potentially fraudulent behaviors.

Utilizing blockchain technology to create immutable verified NEMT credentials effectively eliminates the opportunity for organizations to fraudulently manipulate credentials.

Further, utilizing electronic validation tools, digitized credentials, and comparative analytics can identify patterns and inconsistencies in credentials. This capability simplifies the work currently performed by all industry participants to seek out potential fraud and abuse.

D. Expand Impact of Audits

Current NEMT audit practices are episodic and evaluate samples of credentials. This creates opportunities for bad actors to operate undetected while simultaneously burdening ethical organizations with the tasks associated with supporting manual audit and compliance activities.

Completing electronic compliance monitoring would reduce overall audit workloads and improve the likelihood of identifying and addressing compliance shortcomings.

Furthermore, it allows organizations to maintain a more wholistic understanding of their network's size, risks, and overall compliance.

E. Enhance Quality Measures with Credentials Data

A clear theme established on the CMS listening sessions was that quality measures are underutilized in evaluating NEMT performance. Credentials play a key role in establishing quality measures, but current NEMT credentialing practices make it difficult to access and evaluate this information. Utilizing digitized credentials and thoughtfully analyzing this information, at-scale, can enable the use of credentials in overall NEMT performance management.

Leading Through Change

The ideas initially shared among a few NEMT visionaries rapidly gained clarity and support. In 2020, leading NEMT organizations came together to begin creating practical solutions that would enable the entire NEMT industry to enhance its credentialing practices. The team included the NEMTAC Compliance & Regulatory Advisory Board and other NEMT organizations, both large and small, from across the country.

They focused on enabling collaboration, managing diverse credentialing requirements, data security and reliability, and the ability to mature with the industry in support of future innovation. They enlisted ProCredEx, which specializes in building collaborative credentialing networks through blockchain powered digital exchanges, to assist. For a few months, the team defined the specific capabilities and requirements that would address the credentialing and compliance needs of the NEMT industry and soon, NEMTCredEx was launched. In the following weeks, an initial pilot program was defined, and project champions began to emerge.

The 2021 NEMTAC Conference in Scottsdale, Arizona marked a major milestone in the advancement of NEMT credentialing. Transportation providers, brokers, payors, and regulators came together to formally discuss credentialing as one of the top issues faced by the NEMT industry.

During the keynote address, it was explained how the NEMT industry was coming together to elevate its compliance programs and chart a pathway to:



The conference was punctuated by a panel discussion where the State of Tennessee Medicaid Program (TennCare) and its partners outlined a vision for how they would establish the nation's first credentialing network and demonstrate improved compliance and program integrity processes.

Tennessee Proving Ground

In less than a year, the State of Tennessee identified desired credentialing improvements, designed a pilot, launched a collaborative NEMT credentialing network, and tested its performance. The initiative was championed by selfless and innovative leaders committed to improving NEMT credentialing not only for themselves, but for the entire industry.

In a testament to the strength of Tennessee's Medicaid NEMT program, this initiative was supported by TennCare, every managed care organization, every broker, and innovation-minded transportation providers from across the state. A true example of collaborators and competitors coming together for a common good.

While Tennessee is leading the nation with its pilot work, it is not alone in championing NEMT credentialing innovations. Over 50 transportation providers, brokers, payors, and regulators across 25 states are in various stages of launching credentialing improvement programs and demonstrating that credentialing can be a transformative force in the NEMT industry.

Solution Description

Through its research and deliberations, the team identified capabilities they felt would elevate the NEMT industry's credentialing program beyond that of traditional credentialing processes. These included:

A. Collaborative Credentialing Networks

Credentialing is a historically siloed task. Every organization has its own processes and preferences. Where technology tools do exist, they are focused on each organization's independent credentialing process.

However, credentialing is a partnership-driven and interdependent activity. The team understood that elevating the industry's credentialing programs requires tools that enhance the ability to effectively collaborate and support both internal AND partner credentialing processes.

B. Managing Diverse Credentialing Requirements

While there is a clear desire to increase standardization in credentialing requirements, achieving this goal has many barriers. Fortunately, technology has advanced such that diverse sets of requirements can be managed simultaneously and automatically. The result is a scalable ability to fulfill diverse requirements without duplicative effort, redundant processes, or the need to adopt/enforce systemic standards.

C. Enhanced Data Security & Reliability

Collaborative credentialing requires advanced data security and the ability to manage and track data sharing so that all participants can trust the process. Blockchain (distributed ledger technology) ensures the provenance, ownership, and reliability of credentials data.

D. Foundation for Continued Innovation

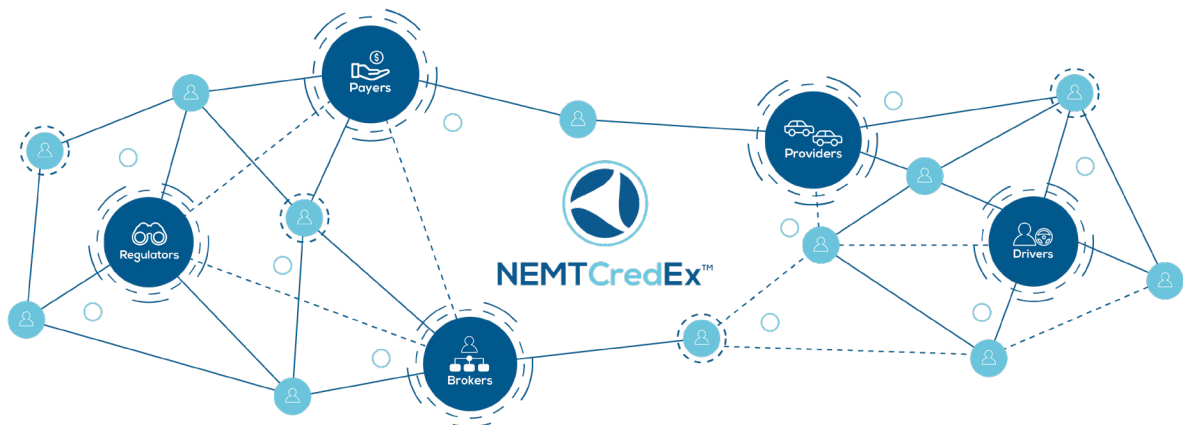
Credentialing is the foundation for more effective compliance and program integrity processes. Fully digitizing credentials, utilizing distributed ledger technology to secure and trace credentials, and applying real-time validation engines to automatically analyze and organize data, positions high-quality credentials to be utilized in other critical program integrity processes such as scheduling, dispatch, billing, and network management. As a result, improving NEMT credentialing processes is a simultaneous investment in elevating these other administrative functions.

NEMTCredEx Overview

NEMTCredEx is a collaborative network and digital credentials exchange purpose built to enable NEMT organizations to elevate their compliance and program integrity operations.

The solution is comprised of a collaborative member network, a technology platform, and support services. Together these components represent a comprehensive solution that updates the traditional notion of credentialing into to a dynamic compliance support tool that enables a broad range of program integrity processes.

A. Collaborative Member Network



Today, organizations maintain their own, independent, tools for supporting credentialing. NEMTCredEx digitally integrates each NEMT organization's unique credentialing technology and processes, and establishes a digital network specifically designed to connect partners so they can understand each other's requirements, comprehensively evaluate compliance, and efficiently share credentials using a common tool. This connectedness brings clarity, transparency, and efficiency to the traditionally siloed process that relies so much on collaboration.

B. Digital Exchange

NEMTCredEx's technology utilizes computing strategies that uniquely improve the ability to manage credentials, collaborate, and maintain compliance.

The platform's *validation engine* applies user-defined requirements to credentials data enabling automatic analysis and organization of credentials. This capability directly addresses the manual and redundant nature of traditional credentialing tasks and the inherent variation in standards that exist among NEMT partners. The validation engine's real-time ability to manage large quantities of unique requirements addresses the NEMT industry's need for scalable compliance support.

Distributed ledger technology (blockchain) also plays a strategic role in advancing NEMT credentialing capabilities. Security, trust, and reliability are core tenets of collaborative credentialing. NEMTCredEx uses distributed ledger technology to establish the provenance of credentials, render them immutable, and produce a permanent chain-of-custody for every credential.

C. Support Services

Through close collaboration with NEMT transportation providers, brokers, payors, and regulators it became clear that the optimal level of program support varies greatly across the industry. A founding principal of the NEMTCredEx program is to meet each organization at its unique level of credentialing sophistication. To fulfill that promise, NEMTCredEx maintains robust support services. This includes onboarding support, training, configuration management, systems integration, and credential digitization.



Together, these components power a broad range of capabilities uniquely designed to meet the diverse credentialing needs of the industry while positioning NEMT organizations to continuously mature their program integrity programs.

Pilot Overview

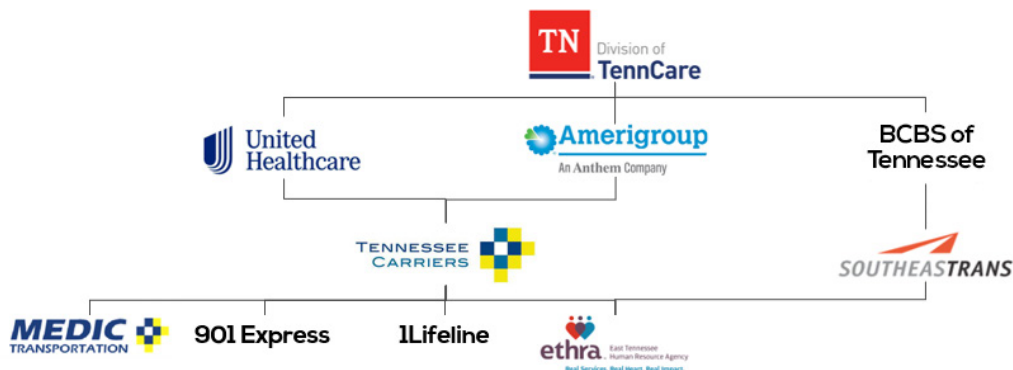
The pilot was designed to demonstrate improved credentialing capabilities that fulfill the strategic goals to:



Additionally, the pilot was used to examine adoption of NEMTCredEx and its effectiveness in assisting NEMT organizations in elevating their credentialing capabilities. This work was completed between September 2021 and June 2022 and included pilot design, participant onboarding, credential digitization, technology configuration, execution of live-data pilot scenarios, and collection of participant feedback.

Pilot Participants

The pilot was led by the State of Tennessee’s Medicaid program, TennCare. TennCare is served by three managed care organizations (Amerigroup, BlueCare, and United Healthcare) all of which participated in the pilot. TennCare’s two brokers (Southeastrans and Tennessee Carriers) facilitate the delivery of NEMT services across the state. Both organizations participated in the pilot. Transportation providers were represented in the pilot by 1Lifeline, 901 Express Transportation, East Tennessee Human Resources Agency, and Medic Transportation.



Industry leadership, strategic guidance, and program support was provided by the Non-Emergency Medical Transportation Accreditation Commission (NEMTAC) and its Compliance & Regulatory Advisory Board as well as other engaged NEMT organizations from across the country.

All participants worked together to create a true-to-life environment where real credentials were used to fulfill real NEMT credentialing requirements between actual industry partners.

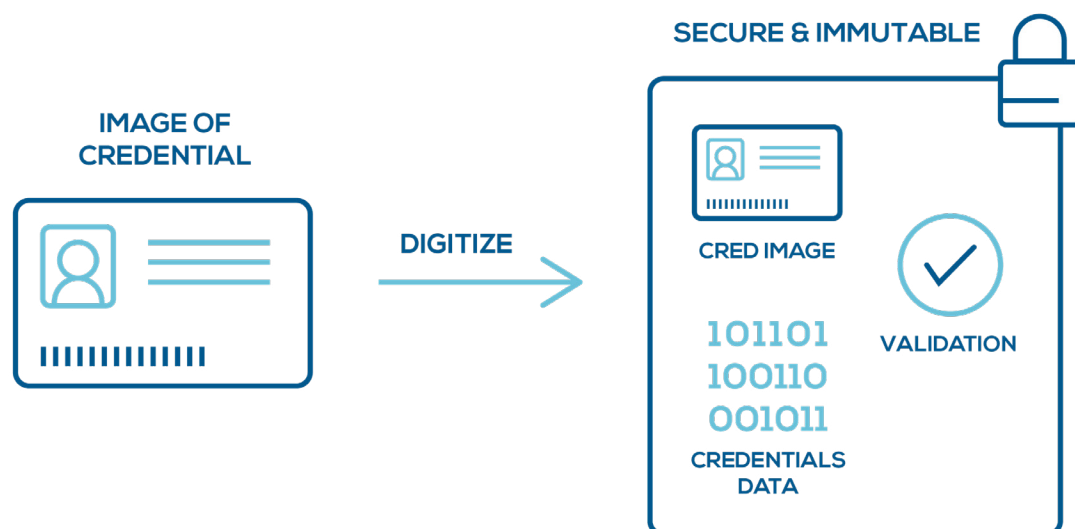
Pilot Scenarios

The following participant-defined scenarios were completed the week of June 6th, 2022.

A. Digitize Credentials

Participants identified real driver, vehicle, and corporate credentials to use during the pilot. These credentials were paper documents, .pdf documents, or spreadsheets that were transformed to fully digitized and cryptographically secured credentials. This task was completed either by pilot participants or NEMTCredEx's digitization support service.

Digitization is the process whereby the image of a credential and discrete data points about that credential are captured electronically. Fully digitized credentials are the foundation to improved program integrity because the image and discrete data enable automated organization, analysis, and curation of credentials in support of compliance tasks.



B. Proactive Compliance Checks

Every pilot participants' unique credentialing requirements were configured on NEMTCredEx. Each participant then automatically analyzed their digitized driver, vehicle, and organizational credentials against the compliance requirements of their partners to determine if compliance standards were met.



For example, Medic Transportation checked their credentials against the requirements of their broker (Tennessee Carriers), MCOs (Amerigroup, and United Healthcare) and Medicaid regulator (TennCare). In completing this check, NEMTCredEx automatically produced a report of any gaps in Medic Transportation's credentials.

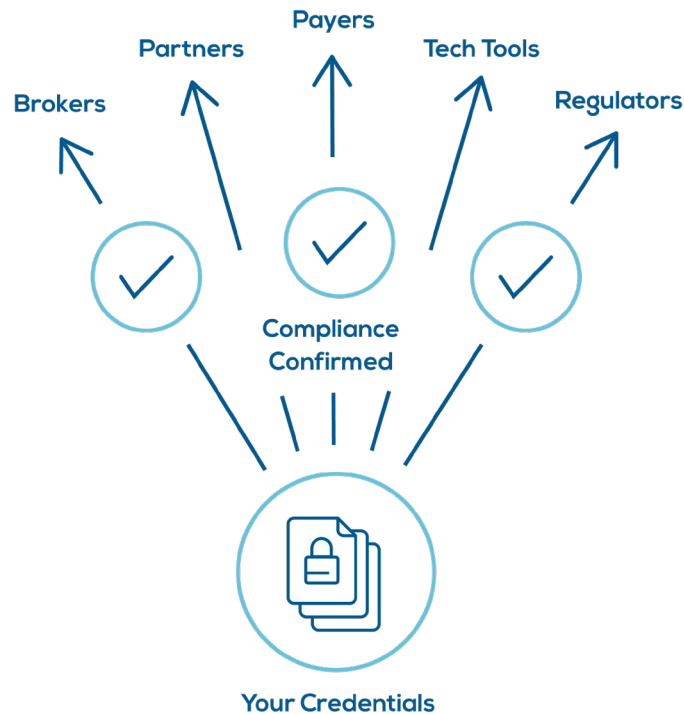
As a result, Medic Transportation was able to proactively address these gaps rather than completing the back-and-forth that normally occurs between NEMT partners as they work to organize a compliant set of credentials.

C. Share Credentials with Partners

NEMT organizations continuously share credentials with their partners to fulfill compliance requirements and support various operational functions. This process requires the sender to analyze their credentials and package them in accordance with the recipient's unique credentialing requirements. The sender must also use the recipient's preferred tools for delivering the credentials.

These tools vary greatly across organizations and can include unsecure or secure email, submission to proprietary portals, uploading to cloud-based drives, and video conference calls. Due to the manual and redundant nature of this complex process, it is extremely time and labor-intensive.

Current credential sharing practices are also prone to errors, so partners are burdened with additional coordination and reconciliation tasks. Emails, phone calls, spreadsheets, and system notes pass back and forth between partners to track-down missing credentials and to ensure the proper version of a given credential is on file at both organizations. The tracking and chasing continue until all gaps are fulfilled. This ongoing process adds no practical value to NEMT compliance efforts. It exists solely to improve the effectiveness of an inefficient sharing process and distracts the team members responsible for analyzing risk and ensuring compliance.



During the pilot, participants utilized NEMTCredEx to facilitate the sharing of credentials between partners. Because the credentials are digitized, NEMTCredEx automatically organized them in accordance with the recipient's requirements. The sender already knew the credentials would fulfill the recipient's requirements because of the proactive compliance check. The sender simply clicked "SHARE" and the recipient was immediately granted access to the credentials and received a notification.

Because the partners collaborated through a common tool, all tracking and reconciliation tasks were eliminated. Both parties have a permanent record of exactly what credentials were shared, when they were shared, and what team members completed the transaction.

The recipients also used NEMTCredEx's automatic auditing tool to analyze the incoming credentials. This added further efficiency to the process for the recipient and enabled a more rigorous evaluation of the shared credentials than is normally feasible.

D. Expirables Management

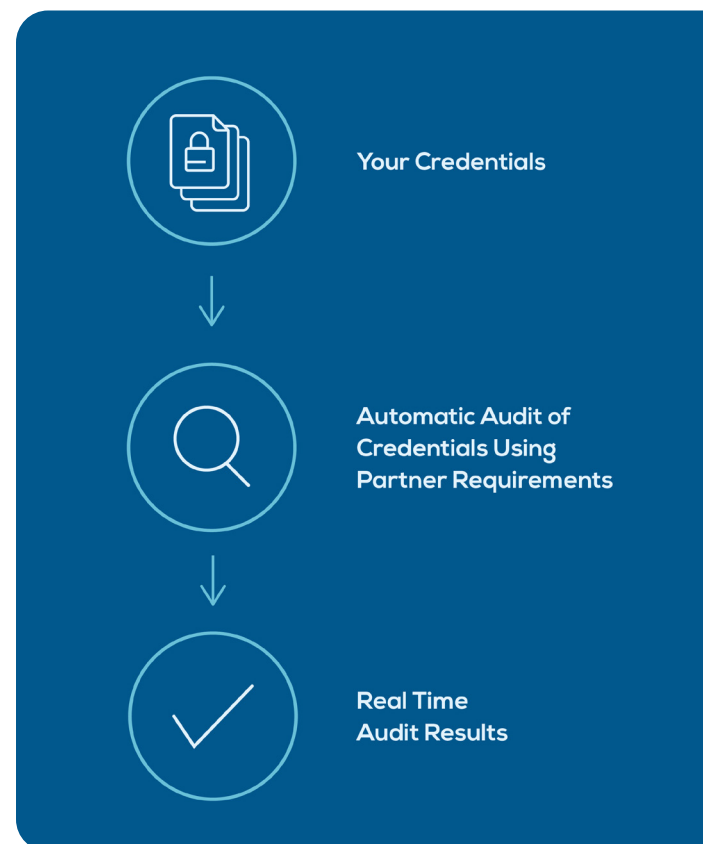
Certain credentials expire and must be updated to maintain compliance. Pilot participants utilized NEMTCredEx to proactively identify and address expiring credentials.

Manual credential review tasks and tracking spreadsheets that are commonly utilized to manage credentials were eliminated. Additionally, pilot participants were able to analyze the credentials for their entire driver and vehicle network in real-time, providing a wholistic view of network compliance and readiness.

E. Partner Audits

All NEMT partners share a responsibility to maintain compliance and program integrity. These organizations redundantly complete the credentialing process to fulfill each partner's unique requirements and then each partner audits the credentials submitted to their organization. The result is a complicated and labor-intensive process whereby thousands of credentials are manually organized, reviewed, and audited on an ongoing basis.

Pilot participants completed a singular credentialing process and utilized NEMTCredEx to automatically organize relevant credentials for each of their partners. Upon receipt of credentials, participants utilized NEMTCredEx's automatic auditing tool to rapidly analyze the credentials and were prompted with specific items that did not meet their requirements. The audit report outlined the specific deficiency for each credential and provided a link where the credential could be reviewed in detail if the participant wished.



F. Roster Updates

NEMT organizations continuously manage roster spreadsheets that detail critical information about drivers and vehicles. On a regular basis, updates are made to the

spreadsheet and then it is shared with partners. Upon receipt, the partners identify changes, complete data integrity checks, and initiate follow-up tasks as needed.

During the pilot, participants utilized NEMTCredEx's automatic auditing tool to produce reports that include insights previously gleaned from the shared spreadsheets. Rather than producing the spreadsheet, sharing it among partners, and asking them to reconcile changes, NEMTCredEx curated the relevant information and empowered participants to review the information on demand and in real time.

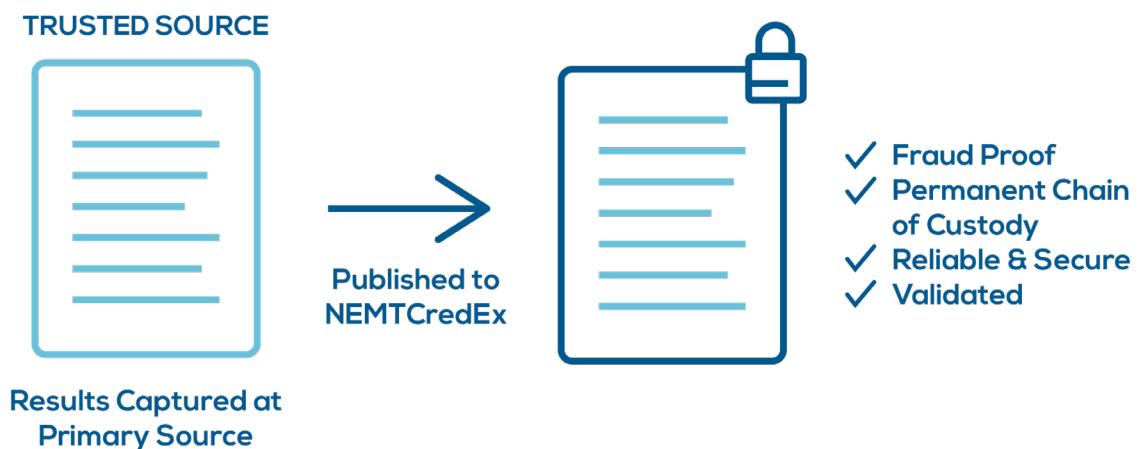
G. Drug Test Audits

NEMT organizations in the State of Tennessee are responsible for demonstrating compliance with a requirement to maintain current drug tests for drivers. Currently, compliance is checked by organizations submitting the drug test to partners which are manually reviewed.

During the pilot, the participants fully digitized the drug test credential and then utilized NEMTCredEx's automatic auditing tool to rapidly review the network's compliance.

H. Fraud-Proof Checks & Screenings

Background checks, motor vehicle records, drug tests, and other screenings are commonly collected by transportation providers as .pdf documents and submitted to their partners. This process presents an opportunity for unethical organizations to manipulate the report findings before they are audited by their partners.



NEMTCredEx enables background screening companies to deliver these credentials directly to their customers through the platform in compliance with the Fair Credit Reporting Act. Because these credentials are rendered immutable by NEMTCredEx's distributed ledger technology, the opportunity for fraud is eliminated.



In support of the pilot, Occuscreen and NEMTCredEx built the tools to enable and successfully test this functionality. Occuscreen maintains relationships with pilot participants enabling them to fulfill these credentialing requirements using a fraud-proof and efficient process.

Pilot Results

Pilot participants observed operational efficiencies and improved credentialing outcomes through their work using pilot processes and tools.

Eliminating Redundant Credentialing Tasks

Today, NEMT organizations must support unique credentialing requirements and processes for every partner. This results in organizations repeatedly handling credentials, redundantly packaging and disseminating credentials, and duplicatively fulfilling requirements.

Pilot participants successfully reduced compliance burdens using improved credentialing strategies

The complexity and effort of managing compliance is high, but pilot participants successfully reduced these burdens through the improved credentialing.

A. Credential Once & Support All

Under TennCare⁹, 125+ organizations work to fulfill between 500 and 875 unique credentialing processes on a continuous basis. With 1,712 drivers and 1,600 vehicles operating in this market, the number of credentials¹⁰ processed is between 188,256 and 329,448 per compliance cycle¹¹.

The participants successfully completed the pilot scenarios via NEMTCredEx using 2,061 credentials. Current credentialing practices would have required between 8,244 and 14,427 credentials.

Using the strategies proven in the pilot, the State of Tennessee Medicaid NEMT Network could reduce redundant credential loads (and their associated administrative burdens) by 75% - 86%. This would NOT require NEMT organizations to relax their compliance requirements and, at scale, positions them to manage program integrity more thoroughly and rigorously.



75% Decrease
in Redundant Credentialing

⁹ Scope of TN Medicaid NEMT Network estimates gathered from pilot participants (125 Transportation Providers, 2 Brokers, 3 Payors, 1 Medicaid Regulator, 1712 Drivers, 1600 Vehicles).

¹⁰ Credential volumes estimated by reviewing NEMTAC Compliance & Regulatory Advisory Board credential types and sampling actual credential sets contributed by NEMTCredEx members. (24 credentials per transportation provider, 22 credentials per driver, 4 credentials per vehicle).

¹¹ Compliance Cycle represents the useful life of a credential for use by an NEMT network in compliance and program integrity processes. A compliance cycle ends for a credential when it expires, must be refreshed to maintain compliance with regulation or contract terms, or is updated by the transportation provider, broker, or payor.

B. Minimize Handling of Credentials

Credentials are commonly paper files or electronic images of a paper file. Every time a credential is used to fulfill compliance tasks, a team-member must locate and read the credential. The team-member then acts on that credential.

The pilot participants generally categorized these acts as:



The pilot included 2,061 credentials. With current credentialing practices, the participants would have handled the credentials between 39,159 and 74,196 times¹².

Digitization once creates efficiency and quality for all

These calculations assume that each organization only completes a particular act once per compliance cycle. However, pilot participants established that these acts often occur multiple times for the same credential. Additionally, these calculations reduce the assumed number of acts for payors from seven to five and does not include any acts completed by regulators.

The key to reducing repetitive credential handling is full digitization¹³. A one-time capture of discrete data about a credential and its image, rather than moving paper or .pdf versions between partners repetitively, enables compliance and program integrity efforts for all partners, permanently. Digitization by one creates efficiency and quality gains for all.

The pilot utilized fully digitized credentials enabling electronic organization, analysis, and sharing. Each credential was handled once during the digitization process

¹² Total pilot credentials multiplied by the number of touches completed by a transportation provider, broker, and payor

¹³ Digitization includes capturing discrete data and the image of a credential. Simply capturing a credential as a .jpeg or .pdf file, applying a file naming convention, and uploading it to a file repository or broker upload tool does not enable the electronic analysis, curation, and dissemination capabilities imparted through digitization.

resulting in 2,061 touches. This represents a 95% - 97%¹⁴ reduction in credential handling compared to traditional credentialing practices. If implemented across Tennessee, credential handling could be reduced from 894,216 – 1,694,304 to 47,064¹⁵ per compliance cycle.

C. Network Oriented Sharing Practices

NEMT organizations are responsible for the quality and compliance of the drivers, vehicles, and partners that make up their network. This necessitates the submission of credentials among these partners for analysis and review.

Under TennCare, this includes 125+ transportation providers submitting credentials to one or both brokers. In turn, brokers submit credentials to one or more of the three payors. Finally, payors submit credentials to TennCare for audits and reporting.

Each submission process is unique and optimized for the recipient's internal operations. The result is six different credential submission processes.

Because these processes are internally optimized for the recipient, they are redundant and manual for the submitting organization creating an unnecessary administrative burden.

This administrative burden is magnified by the process' lack of tracking transparency. This results in a frustrating reconciliation process through which submission status updates, information gaps, and receipt confirmations are passed between partners through secondary communication channels such as emails and phone calls.

The process is further hindered by its siloed nature. As sensitive data passes between systems, security risks are increased. In some instances, sensitive data is shared through unencrypted email.

The pilot reduced credential submission processes from six to one utilizing NEMTCredEx to share credentials among trusted partners

¹⁴ Percentage difference between single touch of total credentials and traditional number of touches across total credentials by a transportation provider, broker, and payor

¹⁵ Applies touches completed by transportation providers, brokers, and payors to estimated total credentials under management in Tennessee NEMT Medicaid Network.

Participants reduced credential submission processes from six to one during the pilot by utilizing NEMTCredEx to share credentials among partners. Because NEMTCredEx is network-focused it is optimized for collaboration.

It automatically packaged relevant credentials based on the unique requirements of the recipient which reduced the manual effort needed to prepare a submission.

Pilot participants reported this process taking hours of time using current methods but only minutes using NEMTCredEx.

All question of who shared credentials, when the credentials were shared, and “if” they were received was eliminated as NEMTCredEx maintains an immutable and permanent record of all transactions. As a result, the need for reconciliation and tracking were eliminated.

Submission confirmation, reconciliation, and tracking was eliminated

The benefits of a shared collaboration tool were further highlighted by the fact that all credentials shared during the pilot were done so through NEMTCredEx’s encrypted platform enhancing the processes overall security for all participants.

Even with the exceptionally strong leadership from TennCare and the truly supportive, caring, and innovative-minded payors, brokers, and transportation providers in Tennessee, the pilot participants agreed that the processes successfully tested in the pilot would materially improve credential submission and management across the state’s network.

Achieving Proactive Compliance

Pilot participants reported that traditional credentialing processes regularly result in credential submissions that do not meet established requirements. To rectify these gaps, partners complete a cumbersome evaluation and reconciliation process that is commonly described as “chasing credentials.”

Chasing credentials occurs for a few reasons:

- Difficulty remembering/understanding various unique credentialing requirements
- Time consuming, resource intensive, and continuous credential evaluation processes
- Hard to find, organize, and review paper and .pdf-based credentials
- Difficulty navigating disparate submission processes
- Barriers to understanding if partners have received and accepted submissions

Pilot participants proactively reviewed the compliance of their credentials 100% of the time prior to submitting them to partners. Using NEMTCredEx, the proactive compliance check was completed in 16.6 seconds, on average. Pilot participants reported that this approach allowed them to increase the rigor of their credential reviews and more accurately apply partner requirements to their credentialing processes. It was further reported that NEMTCredEx helped pilot participants address gaps in their credentials because the tool linked them directly to the credential in question where they could rapidly update the credential or add a compliant credential to their records. NEMTCredEx also simplified the submission process as all partners utilized a single process with clear indication of submission status.

Maturing Audit Capabilities

In the NEMT industry, compliance and program integrity are measured using audits. These audits are the front lines in protecting NEMT users and ensuring program safety.

Much like other aspects of NEMT operations, audits are manual, time and resource intensive, and are predominantly limited to sampling. Pilot participants consistently communicated the difficulty of completing audit work and the administrative burden it creates for the organizations being audited.

During the pilot, organizations were able to utilize NEMTCredEx to facilitate automatic audits that analyzed the compliance of an organization's credentials against the auditor's compliance requirements. These audits were completed, on average, in less than 17 seconds and are customizable to the unique rules of any organization. In addition to full compliance audits, the tool was used for automatic completion of common program integrity checks such as roster updates, expirables management, and drug test confirmations.

While the NEMTCredEx audit capabilities successfully improved current audit practices by reducing effort, cost, and timelines, it also successfully facilitated audits with greater scope and rigor than what is commonly completed today.

Rather than sampling, NEMT organizations could examine the entire network for compliance and more effectively identify bad actors. Furthermore, the program can support continuous monitoring rather than incremental, sample-based auditing practices. Enhancing the audit process in this way would remove the burden on organizations to prepare for, and support, audits altogether— materially reducing the effort and cost of compliance management while simultaneously increasing the quality of the NEMT program.

Strategic Outcomes

Beyond the tactical credentialing process improvements outlined in the previous section, the pilot successfully demonstrated fulfillment of strategic outcomes that materially enhance the NEMT industry.

A. Maximizes NEMT's Community Impact

NEMT is a critical service for community members that lack access to transportation, require assistance due to clinical impedances, or have appointments at locations or times where public transit is not available. Any opportunity to serve this community more effectively has a ripple-effect in healthcare and overall wellness. The strategies and tools tested during the pilot improves NEMT safety, availability, quality, and costs, resulting in improved service throughout our communities.

B. Elevates Compliance & Program Integrity

NEMT compliance and program integrity improvements benefit everyone, but organizations often lack the time, knowledge, and tools to effectively complete this work. The pilot showcased credentialing strategies and tools that empowered organizations to more easily complete credentialing tasks and rapidly evaluate their compliance levels. This shift in focus from managing paperwork to continuous compliance evaluation marks a fundamental turn to proactive quality management in NEMT.

While the program seeks to improve compliance levels from the start of the credentialing process, it also enables more effective enforcement. The use of primary source credentials on a blockchain creates a direct barrier to credentialing fraud. Further, fully digitized credentials power automatic auditing that enables larger quantities of credentials to be rapidly reviewed in greater detail.

C. Utilize Credentials in Quality Measurement

Today it is very difficult to differentiate between highly compliant and quality driven NEMT organizations and others that are minimizing or, even worse, purposefully not meeting established requirements. The program changes this dynamic, giving organizations the ability to utilize credentials data in quality measures and apply those measure in business decisions.

D. Enables Network Management

Currently, it is difficult to understand how many compliant drivers and vehicles are active. It is also difficult to evaluate network readiness. These challenges exist because reliable data is hard to access and analyze. Audits are completed based on small samples and more impactful analyses require manual calculations and evaluation.

The pilot effectively eliminated this dynamic by using digitized credentials and automatic auditing tools. Pilot participants were able to rapidly test any requirements they desired. Rather than examining credential samples, they were able to examine the entire population of drivers, vehicles, transportation providers, brokers, and payors, simultaneously.

The pilot demonstrated the ability to improve decision making abilities by expanding access to data and insights that were previously unavailable to the industry.

E. Enables Collaborative Credentialing

The pilot represented a fundamental change in NEMT credentialing strategies. Rather than organizations working independently to fulfill each other's disparate requirements and duplicating credentials in data siloes, partners collaborated using NEMTCredEx. This eliminated redundant credentialing tasks and created a reliable set of credentials among partners. Everyone understood credentialing goals and utilized tools optimized for sharing to reconcile distribution and receipt of credentials between partners.

Pilot Recognition & Program Feedback

The pilot was made possible due to the vision, leadership, and commitment from a large group of dedicated NEMT professionals. The following details their participation and captures their feedback on the project.

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Executive Champion

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Executive Champion

Michele Napier

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TennCare (Tennessee Medicaid)

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Tennessee Medicaid NEMT Brokers

**Tennessee
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Tammy Mihm
TennCare

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CTS

Mark Porterfield
Careavan

Dan Reid
Grove Transit

Kevin Teasdale
Secure Medical Transport

Tammy Wright
MTM

“

Love it! It saves a lot of time and is great for the people of Tennessee.

This really benefits me a lot.

This is more than we ever dreamed it would be.

This removes the redundancy for everyone.

I want to do it today. It's so much easier.

This is really a lot easier.

We're paying for folks to duplicate effort today. The pilot eliminated that.

Oh my gosh! I can eat lunch again.

”

“

I'm blown away and so impressed with this.

Let's move this forward as quickly as possible.

The word is efficient.

This streamlines handling of documentation and auditing. It is very exciting.

Originally, I thought this was something that would cause me work, but it is not. It really reduced the workload for me!

It allows all parties to stay on the same page in real time.

We have a desire to do things better and this is what we were after.

”

Foundation for Program Integrity Excellence

Combating fraud, waste, and abuse in NEMT is a priority for many organizations. In credentialing, fraudulent behavior generally arises when an organization needs a driver or vehicle to provide services, but they do not meet defined credentialing requirements. These groups falsify credentials making it appear as though the driver or vehicle is compliant and then pass these fraudulent credentials to their partners to fulfill contract or audit requirements. Another form of credentialing fraud in NEMT occurs when organizations deliberately omit required credentials hoping the gap is not found by their partners. Often, these fake or missing credentials are not discovered, and non-compliant drivers and vehicles are used to provide NEMT services that directly endangers the safety and security of vulnerable riders.

The pilot effectively demonstrated how improved credentialing strategies and tools reduce the opportunity for credentialing fraud in NEMT. However, credentials can also play a role in fighting fraud, waste, and abuse in other areas of NEMT. Credentials represent the foundational identity of drivers, vehicles, and organizations in NEMT. The pilot showed how fully digitized credentials enable automatic processing. These same digitized credentials can power other electronic processes such as scheduling, dispatch, billing, and performance evaluation.

Improved credentialing is the foundation for improved NEMT scheduling, dispatch, billing, and performance management

Today, credentials data is rarely utilized in these processes. Incorporating digitized credentials into these processes could result in:

- Proactive driver and vehicle compliance checks prior to ride assignment (i.e., Prior Authorization)
- Proactive confirmation of driver, vehicle, and organization compliance in billing actions
- Alignment of performance outcomes with driver, vehicle, and organizational experience and qualifications to identify best-in-class trends

High-quality digitized credentials enhance our ability to evaluate NEMT business processes and more efficiently complete tasks. Adoption of improved credentialing practices across NEMT and the utilization of continuously maintained digitized credentials can power enhanced administrative processes that could essentially eliminate fraud, waste, and abuse in NEMT.

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