



## MEMORANDUM

**To:** Sara Harrison, Rhode Island Program Director, MTM  
Paul Hynes, Acting Rhode Island Program Director, MTM  
Tammy Wright, Chief Compliance Officer, MTM

**From:** Nina M. Lennon, Administrator of Medical Services

**cc:** Kristin Sousa, Medicaid Program Director, EOHHS  
Mark Kraics, Deputy Medicaid Program Director, Managed Care Oversight, EOHHS  
Daniel Connors, Chief of Staff, EOHHS  
Jane Morgan, Esq., Medicaid Executive Legal Counsel, EOHHS  
Lynn Doherty, Medicaid Managed Care Compliance Officer, EOHHS

**Date:** August 28, 2024

**Subject:** Closure of the Corrective Action Plan

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This Memorandum hereby notifies Medical Transportation Management Inc. (herein referred to as “MTM”), has satisfactorily resolved the Corrective Action Plan (herein referred to as a “CAP”) imposed by the Rhode Island Executive Office of Health and Human Services (EOHHS) for violation of contractual obligations pursuant to Section 13.13, Complaint Tiers, Critical Incidents and Reporting Timeframes, of the State’s Non-Emergency Medical Transportation (NEMT) Contract (herein referred to as “Agreement”). MTM was formally notified and placed on a corrective action on December 4, 2023, after MTM failed to adequately notify EOHHS of a Tier 1 incident. Specifically, EOHHS identified two (2) reported member incidents that had been categorized as Tier One (1) Critical Incidents and MTM did not submit these incidents within the required timeframe, which is immediately, but no later than within six (6) hours or sooner of when MTM is first notified of the incident.

Since when EOHHS formally notified MTM that we were imposing the corrective action plan, MTM implemented a variety of compliance improvement and enhancement activities to avert non-compliance findings to satisfy adherence to Section 13.13 of the Agreement. Such efforts by MTM include the following actions to avoid noncompliance with Section 13.13 of the Agreement and prevent future failures by MTM:

1. Updating the RI Transportation Provider (herein referred to as “TP”) Handbook to include language explaining Section 13.13, Complaint Tiers, Critical Incidents and Reporting Timeframes. This guide serves as an operating manual for the TPs.



2. MTM, in partnership with EOHHS, developed a training presentation for the TPs on the requirements and standards within Section 13.13 and required all TPs to complete the training to ensure they understood what was required of them.
3. MTM amended all the TP service agreements to include a liquidated damage clause for failure to report according to the prescribed standards. This change defines a monetary amount which can be assessed if they breach the agreement.
4. MTM developed a 1-page *Accident & Incident Quick Reference Guide* for the TPs. This is an additional resource for TPs to utilize focusing on key reporting requirements and other important information. This guide aids the TPs to make quick decisions regarding Tier 1 incidents and the methods to report them to MTM.
5. MTM updated the RI Tier 1 Notification After Hours process. This allowed for a more streamlined, reliable, and more responsive communication workflow when Tier 1 complaints are received after hours.
6. A new online communication channel for MTMs RI incident alerting was developed. This allows for timely internal notifications of Tier 1 incidents and accidents.
7. MTM trained all customer care representatives (CCR's), operational reference center staff and escalation supervisors on Section 13.13, Complaint Tiers, Critical Incidents and Reporting Timeframes. The WeCare line staff, which is a centralized department that handles member complaints were also trained on the process from start to finish and the escalation paths.
8. MTM updated the RI protocols that CCRs use as a reference guide on every member interaction to include this contract requirements. This enables each CCR to be fully informed and have the tools they need, to take each call.
9. MTM has completed a system enhancement called *Visual Indicators for Incidents & Accidents* to add an additional level of monitoring. The value of this is found when a user is viewing an incident or accident in the system, the action type will be bold and brought to the top of the queue for processing.

After a review of the information and actions taken by MTM, included in this Memorandum, EOHHS finds that MTM has satisfactorily implemented measures to reasonably meet the contractual requirements of **Section 13.13 Complaint Tiers, Critical Incidents and Reporting Timeframes** and EOHHS considers this matter closed and corrected.

While EOHHS is closing this corrective action plan, MTM will be required to meet this contractual requirement and if there are any additional untimely Tier 1 incidents the CAP may be re-opened solely at EOHHS' discretion. MTM will also be required to complete an agreed upon technical enhancement called *Incident/Accident Keyword Identification* to add an additional level of monitoring. The value of this is when a user is entering a complaint, the system will look for keywords that the user has entered such as 'accident' or 'police' and if keywords are detected, the



system enhancement will prompt the user to confirm that this is a complaint or should be documented as an incident/accident pursuant to the requirements of Section 13.13. The goal is to help minimize human errors.

Please reach out if you have questions about this matter.

Best Regards,

Nina M. Lennon, Administrator of Medical Services

