



EOHHS Complaints from the Public Management Requirements

Policy and Procedures for Non-Emergency Medical Transportation Contract

Rhode Island Executive Office of Health and Human Services

Update: September 16, 2024

Introduction to Policy

The Executive Office of Health and Human Services (EOHHS) contracts to provide statewide transportation brokerage services for the Rhode Island Non-Emergency Medical Transportation (NEMT) Program. The NEMT Program is for:

1. Eligible and enrolled Medicaid members.
2. Rhode Island residents sixty (60) years of age or older who need transportation under the Elderly Transportation Program (ETP); and,
3. Monthly bus pass distribution under the Temporary Assistance for Needy Families (TANF) Program.

Purpose

The purpose of this policy is to outline requirements in the NEMT contract, section 13.11 'Complaints from the Public'. Specifically:

- The Contractor shall have a process to collect, document and investigate complaints from the public regarding unsafe, aggressive, or poor driving performance on the part of a transportation provider vehicle.
- The Contractor shall display information on its website and other EOHHS approved methods and mediums for the public to report these complaints to the Contractor.
- The Contractor shall be responsive to reports by the public and intervene through corrective action towards the transportation providers (herein referred to as "TP") and/or drivers.
- The Contractor shall include complaints from the public when assigning future trips to a TP.

The NEMT Contract also provides for a contractor performance standard related to the number of Complaints from the Public received.

Policy

The effective date of this policy is January 1, 2025.

Section 1: Procedures

This section outlines NEMT procedures and requirements for complaints from the public management. Transportation providers must comply with all EOHHS and contractual requirements.

The Contractor shall have a process to collect, document and investigate complaints from the public regarding unsafe, aggressive, or poor driving performance on the part of a transportation provider vehicle.

- The Contractor must collect complaints from the public from all sources by which the complaint is made aware. This includes complaints received directly to Contractor's by website, phone, email, applications, and any other method. This also includes complaints received directly by EOHHS and relayed to the Contractor, complaints generated and/or relayed by public officials, facilities, the public, and any other party who has a complaint.
- The Contractor is required document each complaint received directly or transferred. Details of each complaint must be recorded and submitted to EOHHS on a regular basis such as:
 1. Complainant name
 2. Date of dangerous driving event
 3. Date of when complaint was received
 4. The category of the complainant
 5. Details of the complaint
 6. TP name
 7. The response/evaluation/investigation of the complaint
 8. Resolution action taken
- To be considered a valid complaint counted towards the metrics established by EOHHS under the NEMT Contractor, the following minimum is required:
 1. NEMT Provider code reportable from provider's magnetic signage or NEMT License Number from the magnetic sign and/or Vehicle License Plate Number
 2. Approximate Date, Time, and Location of the incident.

The Contractor shall commit to researching complaints received that lack these datapoints, but these will not be considered against the complaint metric. Over the course of investigation, if finds additional information that identifies the transportation provider, the complaint will reapply against the metric.

The Contractor shall display information on its website and other EOHHS approved methods and mediums for the public to report these complaints to NEMT contractor.

- The Contractor must develop and implement this requirement and provide the details of such for EOHHS approval.

The Contractor shall be responsive to reports by the public and intervene through corrective action towards the TP and/or driver.

- The Contractor is to report to EOHHS any corrective actions towards any TP and/or driver resulting from complaints from the public.

The Contractor shall include complaints from the public when assigning future trips to a TP.

- The Contractor must report to EOHHS any instances where assignment of trips to any TP has been modified or altered resulting from complaints from the public against the TP.

The Contractor contract also provides for a contractor performance standard related to the number of Complaints from the Public received.

The performance standard is:

Less than five percent (5%) of total complaints per month shall be from a member of the public who files a complaint with the Contractor due to hazardous or unsafe driving.

There is no distinction of complaints from the public as to whether they are deemed validated or invalidated. All such complaints, as described herein, are to be counted towards the 5% standard because a complaint from the public was submitted.

Additional measure detail information is:

A member of the public is defined as any individual located in RI who files a complaint with the Contractor and is currently not enrolled in the Rhode Island NEMT Program or actively using the NEMT benefit as a member.

A member from the public, for purposes of the additional measure described, above, is any person who submits a complaint, as defined herein, and is not utilizing, or is not assigned as a passenger to, the vehicle that is the subject of the complaint at the time. When an enrolled Medicaid member witnesses and reports an unsafe, aggressive, or poor driving performance event by a currently enrolled TP vehicle and the member is not utilizing or is not assigned as a passenger to that vehicle, that complaint will be counted towards the 5% standard. This standard also applies to the ETP membership.

Policy Summary

Policy Owner:	RI NEMT Administrator		
Policy Reviewers:			
Effective Date:	July 1, 2024		
Policy Approved:	Name:	Nina M. Lennon	Date:
Policy Reviewed:	Name:		Date:
Policy Retired Date:			