

STATE OF CONNECTICUT



FY 21 PERFORMANCE AUDIT COMPLIANCE REPORT

Non-Emergency Medical Transportation (Follow-up Report)

AUDITORS OF PUBLIC ACCOUNTS

JOHN C. GERAGOSIAN ❖ CLARK J. CHAPIN

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Introduction

Background

Our office published the Non-Emergency Medical Transportation (NEMT) [performance audit](#) on February 19, 2020. We requested an update on February 23, 2021 from the Department of Social Services (DSS) and NEMT broker Veyo on how they addressed the 59 recommendations. The report's recommendations focused on Veyo call center performance, trip service and performance, complaint handling, and DSS oversight of Veyo.

DSS expects to issue a new non-emergency medical transportation request for proposal in July 2021. The new contract is projected to go into effect on January 1, 2022, to allow a three-month overlap with the existing contract. The new contract is expected to be fully operational on April 1, 2022.

Highlighted Agency Accomplishments

Following release of the performance audit on February 19, 2020, the contract between DSS and NEMT broker Veyo was [amended](#) in June 2020, December 2020, and January 2021. As a result of these amendments and other changes, DSS and Veyo have partially or fully implemented 46 of 59 (78%) of our audit recommendations. Highlights include:

- Certain contract requirements were clarified:
 - Percentage of calls that must be answered by employees located in Connecticut
 - Reporting of calls received within and outside of normal business hours
 - Definition of abandoned calls and when they are excluded from certain reported calculations
 - Definition of a complaint
- The Connecticut NEMT Veyo website now includes additional information about public transportation, and bus passes mailed to members include correspondence with a link to this information
- A wait time of 10 minutes is now required before declaring a member to be a no-show for an NEMT trip
- Veyo now consistently requires a corrective action plan for transportation providers with on-time trip percentages of less than 95%
- Veyo now is required to acknowledge a complaint within 5 business days and to investigate and resolve complaints within 30 days
- Veyo administers a knowledge-based test to all drivers to ensure their understanding of required training prior to allowing drivers to provide NEMT services
- Veyo trained call center agents to record all complaints, including those resolved at the time of the initial call
- Veyo established a separate telephone prompt which can be used to file complaints when members call the tollfree telephone number



Performance Audit Highlights

Non-Emergency Medical Transportation (From Report Issued February 19, 2020)

Background

The purpose of this audit was to assess the efficiency and effectiveness of Connecticut’s Non-Emergency Medical Transportation (NEMT) broker Veyo, and the DSS oversight of NEMT and administration of the state Medicaid program. The audit examined the arrangement and delivery of transportation services, adequacy of the transportation network, complaint handling, and DSS’s use of sanctioning Veyo to incentivize better contract performance.

Approximately 59% of NEMT trips are completed by bus, 32% by taxi or livery, 7% by wheelchair van, and 2% by mileage reimbursement.

Veyo introduced an Uber-like model of delivery in which Veyo independent drivers (Veyo IDPs) supplement the more traditional taxicabs and livery vehicles. The Veyo IDPs have grown from less than 1% of completed NEMT trips to 5% in August 2019. Veyo IDPs operate under different rules and provide NEMT primarily in the Hartford and New Haven counties.

Key Findings

1. DSS does not specify certain requirements of the DSS-Veyo contract such as percentage of call center agents to be located in Connecticut and the definition of abandoned calls
2. Veyo changes statistics, sometimes retroactively, without explanation in its monthly reports to DSS, including its calculation of percent of on-time trips, which raises concerns about the accuracy of some of the reported information
3. Veyo stopped providing certain data without explanation in its monthly reports to DSS, including detailed transportation provider performance and trip removal and data correction statistics
4. Veyo does not always remove drivers who do not meet requirements, and inconsistently uses and tracks corrective action plans
5. Veyo does not record all complaints, accurately substantiate certain complaints, or promptly resolve complaints
6. An estimated 79% of members receiving Veyo NEMT services submitted medical necessity forms to override Veyo’s decisions about transportation to medical providers outside the permitted mileage range or the assigned mode of transportation.
7. DSS rarely imposes sanctions for the times Veyo fails to meet contractual performance standards

Recommendations

We developed 59 specific recommendations to help strengthen Connecticut’s Non-Emergency Medical Transportation. In general, we recommend:

- DSS should amend future contracts to clarify certain requirements that are currently unclear or open to interpretation
- DSS should require Veyo to explain any changes in monthly report calculations and review the Veyo monthly reports more carefully
- DSS should require Veyo to explain when it stops including information in its monthly reports
- Veyo should immediately remove all drivers posing a risk from servicing members, more consistently use provider corrective action plans, and submit documentation monthly to DSS on corrective action plan tracking
- DSS should require Veyo to record, accurately substantiate, and promptly investigate and resolve all complaints
- DSS should require Veyo to reduce the percentage of members having to submit medical necessity forms to reduce the administrative burden on members and healthcare providers, while complying with federal guidelines.
- DSS should regularly review Veyo’s performance, issue sanctions when Veyo does not meet contractual standards, and develop strategies to maximize the effectiveness of sanctions

View the full report, including management’s responses, by visiting www.cga.ct.gov/apa
165 Capitol Avenue ■ Hartford, CT 06106 ■ ctauditors@cga.ct.gov

Agency Updates

Recommendation 1: The Department of Social Services should amend future broker contracts to eliminate the following requirements:

- Monthly report on detailed provider information;
- Daily computerized trip logs member mobility status;
- Requirement that transportation subcontractors send Veyo monthly reports of member complaints;
- Semi-annual transportation provider subcontractor report; and
- Requirement for Veyo to provide Medicaid-specific training to call center staff.

Status: Fully Implemented – The contract was amended to remove the requirement that 1) transportation subcontractors send Veyo monthly reports of member complaints, 2) Veyo provide Medicaid-specific training to call center staff, and 3) Veyo provide the daily computerized trip log’s member mobility status. The amended contract also eliminated the requirement for scheduled transportation provider reports which now must be made available upon request.

DSS/Veyo Update: “Contract amendment A4, page 2, d removes Part I, Section 1, 4.B monthly complaints submitted by transportation providers. Page 3, 5, removes Part I, Section II, 2.D Veyo to provide Medicaid specific training to call center staff. Page 5, f deletes Part I, Section II, 2.R 6 and 8 (daily log mobility status and other transportation resources). Page 8, 11.e updates Part I, Section X, 8 to reflect transportation providers reports are to be available upon request.”

Recommendation 2: The Department of Social Services should amend future contracts to specify the percentage of calls that must be answered by employees located in the state of Connecticut.

Status: Fully Implemented – The contract has been amended to now require that at least 50% of the total call minutes during regular business hours be handled by the Connecticut call center.

DSS/Veyo Update: “Contract amendment 4A, page 2. 4.c updates Part 1, Section I, 4.B by requiring at least 50% of the total call minutes during regular business hours be handled by the CT call center.”

Recommendation 3: The Department of Social Services should require Veyo to provide members with written information on bus routes.

Status: Fully Implemented – The Connecticut NEMT website and member handbook now include additional information about public transit. Veyo began training its personnel on public transit.

DSS/Veyo Update: “The Connecticut NEMT [website \(https://ct.ridewithveyo.com\)](https://ct.ridewithveyo.com) has been modified to include additional information about public transportation in the FAQs section. Public Transportation information is also included in the Member Handbook. Veyo includes the informational letters with the bus passes mailed to members. Additionally, Veyo CSRs can assist the member if they do not have access to the internet. (Contract amendment A4, Page 3, g, updates Part I, Section I, 8.c. regarding public transit training.)”

Recommendation 4: The Department of Social Services should amend future contracts to include the combined reporting of calls received both within and outside of normal business hours.

Status: Fully Implemented – The contract was amended to require Veyo to submit a report with separate data for calls during normal business hours and afterhours calls.

DSS/Veyo Update: “Contract amendment 4A, page 7 section b notes changes to Part I, Section X,3 calls during business hours and after hours.”

Recommendation 5: The Department of Social Services should amend future contracts to define what constitutes abandoned calls and when they are to be included in other monthly report calculations.

Status: Fully Implemented – The amended contract now states, ‘Abandonment rate shall be measured as all calls held in queue to be answered, post IVR, for more than 60 seconds where the member disconnected from the call prior to it being answered by an agent divided by the total calls offered.’

DSS/Veyo Update: “Veyo's reports have been modified to reflect the standard 60-second abandon call definition. Contract amendment 4A, page 5, g updates Part I, Section II, 3.B abandonment rate.”

Recommendation 6: The Department of Social Services should require Veyo to add more Spanish-speaking call center agents to match its service to English-speaking clients. Future contracts should require the separate reporting of key performance indicators for Spanish and English-speaking clients.

Status: Partially Implemented – Although Veyo did not add Spanish-speaking call center agents, it developed Spanish queue metrics for its monthly report, which was part of this recommendation.

DSS/Veyo Update: “Call Center metrics for the Spanish queue are found on p. 5 of the Veyo/Total Transit Monthly Reporting Package.”

Recommendation 7: The Department of Social Services should amend future contracts to exclude abandoned calls from the calculation of average time to answer calls to the Non-Emergency Medical Transportation call center.

Status: Fully Implemented – Veyo began excluding abandoned calls from its calculation of average time to answer calls, beginning September 2019. This change is reflected in the amended contract.

DSS/Veyo Update: “Since September of 2019, abandoned calls have been excluded from the measure.”

Recommendation 8: The Department of Social Services should require Veyo to use the term “call reference number” instead of the current “confirmation number.”

Status: Fully Implemented – Veyo eliminated the use of the term confirmation number and substituted booking reference number. Our goal was to eliminate member confusion that Veyo had confirmed their ride, when the number they received was intended to reference the booking or call.

DSS/Veyo Update: “As of August of 2020, Veyo change their system, guidelines and training to use “booking reference number” instead of “confirmation number”.”

Recommendation 9: The Department of Social Services should require Veyo to report on the percentage of trip verifications, improprieties that were discovered, and a list of the most costly clients, and record the type of trip origin location and destination.

Status: Partially Implemented – Although Veyo did not begin reporting percentage of trip verification and discovered improprieties, DSS amended the contract to require reporting of the costliest clients.

DSS/Veyo Update: “As previously noted, the origin and destination of a trip is recorded as an address with the associated type of healthcare service. Contract amendment 4A, page 7, c updates Part I, Section X, 4 C and H to reflect the quarterly report of most costly members and percentage of trips reviewed.”

Recommendation 10: The Department of Social Services should require Veyo to report Money Follows the Person Program trips separately from Non-Emergency Medical Transportation trips.

Status: Fully Implemented – Veyo began reporting Money Follows the Person Program trips separately beginning in December 2019.

DSS/Veyo Update: “As of December of 2019, Veyo has separated reporting Medicaid and MFP trips.”

Recommendation 11: The Department of Social Services should require Veyo to explain any changes in report calculations of booked or completed trips in the Veyo monthly reports.

Status: Partially Implemented – Although DSS did not require Veyo to explain any changes in its report calculations of booked or completed trips, going forward, Veyo will document changes in its monthly reports.

DSS/Veyo Update: “As noted originally, the process through which this was done, was public and transparent, and the changes were mutually agreed upon by DSS, Veyo and stakeholders. Going forward, changes will be noted in the report document itself.”

Recommendation 12: The Department of Social Services should require Veyo to report transportation performance standards in accordance with the Department of Social Services-Veyo contract.

Status: Fully Implemented – The amended contract includes performance standards which address pickup wait times and drop-off times.

DSS/Veyo Update: “Contract amendment A4, page 6, 8 a and b, update Part I, Section VI, 1 and 2 definitions of pickup and drop off times.”

Recommendation 13: The Department of Social Services should have a July or October start date for the Non-Emergency Medical Transportation contract.

Status: Fully Implemented – DSS extended the current contract through March 31, 2022 to avoid a mid-winter transition.

DSS/Veyo Update: “DSS agrees that the timing of implementation of a new NEMT contract is better suited to a non-winter month and has extended the current contract through March 31, 2022 in order to avoid a mid winter transition.”

Recommendation 14: The Department of Social Services should require Veyo to develop a system to track multi-loaded trips and routinely check that these trips meet the contract’s standards.

Status: Fully Implemented – Veyo developed a system to track multi-loaded trips.

DSS/Veyo Update: “Veyo has created the logic to track multiloading and has provided reports to the Department on multiloading vs. non-multiloading trips; however, due to the COVID-19 pandemic multi-loading has not been permitted for the past year.”

Recommendation 15: The Department of Social Services should amend future contracts to require Veyo to report on early drop-offs separately.

Status: Not Implemented – While drop-off times are included as a performance standard, the contract has not been amended to require Veyo to separately report on early drop-offs.

DSS/Veyo Update: “Reports are aligned with the contract standards of timeliness. Refer to Contract Amendment-17DSS1203HC_A4_Total Transit, p.6, section 8.”

Recommendation 16: The Department of Social Services should require Veyo to develop policies and procedures to handle and implement notification by transportation providers of discontinued prescheduled repeat trips.

Status: Not Implemented – DSS did not require Veyo to develop policies and procedures to handle and implement notification by transportation providers of discontinued prescheduled repeat trips.

DSS/Veyo Update: “DSS and Veyo continue to work together to adapt to the changing NEMT network and member transportation needs.”

Recommendation 17: The Department of Social Services should require Veyo to explain any changes in monthly report calculations of on-time trip percentages.

Status: Partially Implemented – Going forward, Veyo will document any changes in monthly report calculations of on-time trip percentages. However, Veyo will not implement the recommendation to explain these changes.

DSS/Veyo Update: “As noted originally, the process through which this was done, was public and transparent, and the changes were mutually agreed upon by DSS, Veyo and stakeholders. Going forward, changes will be noted in the report document itself. Contract amendment A4, page 6, 8 a and b, update Part I, Section VI, 1 and 2 definitions of pickup and drop off times. Refer to Contract Amendment-17DSS1203HC_A4_Total Transit , p.6, section 8.”

Recommendation 18: The Department of Social Services should review the Veyo monthly reports more carefully and question Veyo when on-time and late trip information appears inaccurate.

Status: Partially Implemented – DSS informed us that it would continue to review report data and seek clarification from Veyo when needed. However, DSS considers this a continuation of its original practice and did not address the recommendation that DSS review the reports more carefully.

DSS/Veyo Update: “It was previously acknowledged that there was an oversight when updating this specific section of the report. The report was correct. It is standard practice for DSS to review the monthly reports and, as necessary, to seek clarification from Veyo to ensure a complete and common understanding of the reported data. DSS will continue that practice.”

Recommendation 19: The Department of Social Services should monitor Veyo’s recording of trip status data more closely.

Status: Partially Implemented – DSS informed us that it would continue to monitor the recording of trip status data more closely and take appropriate action when necessary. DSS considers this a continuation of its original practice.

DSS/Veyo Update: “DSS continues to monitor and will take appropriate action to ensure the accurate reporting of data when necessary.”

Recommendation 20: The Department of Social Services should require Veyo to develop policies and procedures for collaboration with the Department of Social Services’ medical, dental, and behavioral health administrative service organizations to assist clients under the age of 21.

Status: Partially Implemented – While the contract amendment requires Veyo to assist members under the age of 21 with their transportation needs in order to meet Early, Periodic, Screening, Diagnosis and Treatment (EPSDT) requirements, it does not require Veyo to develop policies and procedures for collaboration with the Department of Social Services’ medical, dental, and behavioral health administrative service organizations to assist those clients.

DSS/Veyo Update: “Contract amendment A4, Page 3, section 5 rewords Part I, Section II which discusses working with ASOs and EPSDT for members under 21.”

Recommendation 21: The Department of Social Services should require Veyo to include all trips that occurred in its total number of completed trips, including trips the transportation providers have not finalized.

Status: Not Implemented – DSS did not require Veyo to include non-finalized trips in its total number of completed trips reported.

DSS/Veyo Update: “Finalizing a trip is the mechanism used to validate that a trip was performed. No change has been made to how completed trips are reported.”

Recommendation 22: The Department of Social Services should amend future contracts to require a wait time of 10 minutes before declaring a member to be a no-show for the Non-Emergency Medical Transportation trip.

Status: Fully Implemented – DSS amended the contract to require a 10-minute wait time before declaring a member to be a no-show for the NEMT trip, implementing the change in April 2020.

DSS/Veyo Update: “The change to 10 minutes as included in the Veyo contract amendment as well as in provider agreement. This change was implemented in April 2020. Contract amendment A4, page 6, 8.a updates Part I, Section VI, 1 pickup wait time.”

Recommendation 23: The Department of Social Services should require Veyo to include trip removal and data correction statistics in its monthly reports.

Status: Fully Implemented – Beginning April 2020, DSS required Veyo to include trip removal and data correction statistics in its monthly reports.

DSS/Veyo Update: “This was included in the report beginning in April 2020.”

Recommendation 24: The Department of Social Services should assemble a workgroup to identify factors contributing to the trip removal and data corrections and develop recommendations to reduce them.

Status: Fully Implemented – Identifying the regular meetings between DSS and Veyo as a workgroup, DSS and Veyo added for review the recommended topic of identifying factors contributing to trip removal and data corrections and developing recommendations to reduce them.

DSS/Veyo Update: “The DSS-Veyo workgroup added this topic to their review.”

Recommendation 25: The Department of Social Services should require Veyo to determine late trips for all transportation providers using the same metrics.

Status: Fully Implemented – DSS amended the contract to determine late trips for all transportation providers using the same metric. On-time drop off is now defined as the member arriving at the healthcare appointment prior to the appointment time.

DSS/Veyo Update: “As noted originally, the process through which this was done, was public and transparent, and the changes were mutually agreed upon by DSS, Veyo and stakeholders. Going forward, changes will be noted in the report document itself. Contract amendment A4, page 6, 8 a and b, update Part I, Section VI, 1 and 2 definitions of pickup and drop off times.”

Recommendation 26: The Department of Social Services should require Veyo to have and maintain a computerized log that includes the availability of other transportation resources.

Status: Fully Implemented – DSS amended the contract to require Veyo to maintain information on the availability of other transportation resources in member records.

DSS/Veyo Update: “Contract amendment A4, page 5 updates Part I, Section III, 2.A.2 regarding other member resources. Veyo maintains that information in their member records.”

Recommendation 27: The Department of Social Services should modify its contract to have Veyo instruct Non-Emergency Medical Transportation providers to require proof of member identification prior to transporting the client.

Status: Partially Implemented – Although the contract was not amended to require Veyo to instruct NEMT providers to obtain proof of member identification prior to transporting the client, DSS and Veyo added instructions to confirm member identification in February 2020.

DSS/Veyo Update: “Although the transportation provider agreements already required confirmation of identity, additional instructions were added in February 2020.”

Recommendation 28: The Department of Social Services should enforce the contractual requirement for Veyo to immediately remove all drivers that pose a risk from servicing members.

Status: Fully Implemented – Veyo updated its internal procedures and includes driver status on the critical incident notice sent to DSS.

DSS/Veyo Update: “Veyo updated its internal procedures and a strict policy was enacted in May 2019. Driver status is also included on the critical incident notice sent to DSS.”

Recommendation 29: The Department of Social Services should require Veyo to consistently apply the use of corrective action plans with transportation providers.

Status: Fully Implemented – Beginning February 2020, Veyo updated its internal standard operating procedures to place all transportation providers with on-time performance less than 95% on a corrective action plan.

DSS/Veyo Update: “Veyo updated its internal SOPs and all transportation with an OTP less than 95% were placed on a CAP in February 2020. The Veyo Supply team continues to monitor providers performing under their standard KPIs and take corrective action monthly.”

Recommendation 30: The Department of Social Services should require Veyo to maintain a centralized system to track all corrective action plans issued to third-party operators and submit documentation monthly to DSS on the progress of corrective action plans.

Status: Partially Implemented – Veyo now provides DSS quarterly with a list of transportation providers on corrective action plans. However, we recommended this be done monthly through a centralized tracking system.

DSS/Veyo Update: “Veyo provides the Department with a list of all providers that are placed on a Corrective Action Plan on a quarterly basis. All corrective action plans and/or provider accountability documents are tracked internally and available to DSS upon request.”

Recommendation 31: The Department of Social Services should amend future contracts to make it clearer that Non-Emergency Medical Transportation brokers are required to check the Office of Inspector General exclusion list to ensure that Non-Emergency Medical Transportation federal funds are only disbursed to eligible individuals.

Status: Fully Implemented – DSS amended the contract to clarify that NEMT brokers are required to screen potential transportation providers by checking the Office of the Inspector General exclusion list.

DSS/Veyo Update: “Although the language was already included in the contract, additional language was added to the amendment per the auditor’s request. Page 9 of amendment A4, Part I, Section XII,2.B.”

Recommendation 32: The Department of Social Services should not permit Veyo to subcontract with paratransit programs that have on-time rates lower than 75% of all other third-party transportation providers.

Status: Not Implemented – DSS did not implement the recommendation that Veyo should not be permitted to subcontract with paratransit programs with lower than 75% on-time rates than all other third-party transportation providers.

DSS/Veyo Update: “Paratransit agencies are only doing a handful of trips however Veyo is monitoring and working with them to improve their OTP as there are with the many other third party providers. Paratransit is an important piece of the network and a preferred provider for some members.”

Recommendation 33: The Department of Social Services should require Veyo to treat all transportation network companies consistently.

Status: Fully Implemented – Veyo reported that it treats all transportation network companies consistently, requiring them to follow the credentialing process and meet performance criteria regardless of how they are licensed and regulated by the Connecticut Department of Transportation.

DSS/Veyo Update: “All providers are required to follow the credentialing process and meet performance criteria regardless of how they are licensed and regulated by DOT.”

Recommendation 34: The Department of Social Services should require Veyo to increase the number of wheelchair transport providers to greatly reduce or eliminate the lack of transportation for members being discharged from hospitals or requiring wheelchair transportation.

Status: Not Implemented – DSS did not require Veyo to increase the number of wheelchair transport providers.

DSS/Veyo Update: “NEMT mode capacity and demand is continuously monitored. Recruitment of providers into the network is ongoing based upon utilization and member needs.”

Recommendation 35: The Department of Social Services should instruct Veyo to administer a knowledge-based test to all drivers to ensure their understanding of all required training prior to allowing drivers to provide Non-Emergency Medical Transportation.

Status: Fully Implemented – The contract was amended to require Veyo to administer a knowledge-based test to all drivers.

DSS/Veyo Update: “Veyo administers specific contract-based education to providers; however, PASS training was made compulsory for all drivers working with transportation providers, and Veyo continues to leverage mentor trainings for IDPs along with bi-monthly provider trainings to ensure that everyone is following the correct protocols. Contract amendment A4 page 4, updates contract Part 1, Section II, 2.O.6.k and page 5 updates Part 1, section V, 3.B.”

Recommendation 36: The Department of Social Services should require Veyo to adhere to the contractual definition of a complaint and require Veyo to amend its policies and procedures to match this definition.

Status: Fully Implemented – Veyo retrained its employees dealing with complaints to ensure that they follow the contractual definition of a complaint.

DSS/Veyo Update: “Veyo administered retrainings for all staff dealing with complaints to ensure that they are following the contractual definition in April/May 2019. Refer to 36 – CT FCR Workflow; 36 – CT FCR Training Certificates; and training module:
<https://360.articulate.com/review/content/182ac887-109b-4af6-b27a-115327b45953/review>.”

Recommendation 37: The Department of Social Services should require Veyo to record all complaints in Salesforce, even if the complaint is resolved at the time of the initial call.

Status: Fully Implemented – Veyo now records all complaints in Salesforce, even if they are resolved at the time of the initial call and reports these first-call resolutions in its monthly reports.

DSS/Veyo Update: “Veyo has created a first call resolution process for agents to be able to submit those complaints into Salesforce. All agents have been trained and able to submit all complaints via Salesforce. Refer to 36 – CT FCR Workflow; 36 – CT FCR Training Certificates; and training module: <https://360.articulate.com/review/content/182ac887-109b-4af6-b27a-115327b45953/review>. First Call Resolution metrics are found on p. 16 of the Veyo/Total Transit Monthly Reporting Package.”

Recommendation 38: The Department of Social Services should provide more oversight of the complaint handling process including the accurate substantiation of complaints.

Status: Partially Implemented – Veyo updated its complaint process and retrained its employees on the accurate substantiation of complaints.

DSS/Veyo Update: “DSS provided the updated complaint process. Refer to 38 – 3-11-2021 – CTBHP CFAC Meeting.”

Recommendation 39: The Department of Social Services should monitor its Non-Emergency Medical Transportation broker more carefully to ensure Veyo records all complaints in Salesforce.

Status: Partially Implemented – DSS did not monitor its NEMT broker more carefully. Veyo trained its employees to submit all complaints in Salesforce.

DSS/Veyo Update: “Veyo has created a first call resolution process for agents to be able to submit those complaints into Salesforce. All agents have been trained and able to submit all complaints via Salesforce. DSS provided the updated complaint process.”

Recommendation 40: The Department of Social Services should require Veyo to acknowledge a complaint within 5 business days. The acknowledgement should include a summary of the issue, an explanation of the resolution process, the duration of the process, and any other pertinent information.

Status: Fully Implemented – Veyo updated its internal standard operating procedures and retrained agents in May 2020 including requiring Quality Assurance Coordinators to call members to acknowledge complaints within 5 business days.

DSS/Veyo Update: “Veyo updated its internal SOPs and retrained the agents in May 2020. Veyo is acknowledging all complaints that are filed through a manual process for all methods of submission. Refer to 40 – COMM-CTQA Acknowledgement Calls-120321-0021.”

Recommendation 41: The Department of Social Services should include in future contracts that all complaints be investigated and resolved within 30 days.

Status: Fully Implemented – DSS amended the contract to require Veyo to investigate and resolve all complaints within 30 days.

DSS/Veyo Update: “Contract amendment A4, page 6, 10 adds this requirement to Section I, IX, 1. E of the contract.”

Recommendation 42: The Department of Social Services should require Veyo to change its policies and procedures to allow complaints from facilities (on behalf of members) by telephone, online web form, email, mail, or fax.

Status: Not Implemented – DSS did not require Veyo to change its policies and procedures manual to allow facilities to file complaints on behalf of members via telephone, online web form, email, mail, or fax.

DSS/Veyo Update: “All methods available to members continue to be available to facilities.”

Recommendation 43: The Department of Social Services should require Veyo to adhere to its policies and procedures regarding written complaints by facilities on behalf of the member.

Status: Not Implemented – DSS did not require Veyo to adhere to its policies and procedures regarding written complaints by facilities on behalf of the member, including emailing the results and resolution of the investigation to the facility.

DSS/Veyo Update: “All methods available to members continue to be available to facilities.”

Recommendation 44: The Department of Social Services should consider requiring the Non-Emergency Medical Transportation broker to establish a separate complaint telephone line.

Status: Fully Implemented – On September 2, 2020, Veyo established a separate prompt within the 800 number for members to file complaints.

DSS/Veyo Update: “Veyo has established a separate prompt within the 800 number for the members to file complaints on past trips and escalation agents have already been trained to take these types of calls. The line went into effect on 9/2/20.”

Recommendation 45: The Department of Social Services should require Veyo to categorize complaints (including public transit complaints) more descriptively.

Status: Partially Implemented – Veyo partially implemented this recommendation by updating its internal policy and training its employees to use the “missed pickup” category when members complain that they did not receive bus passes.

DSS/Veyo Update: “Veyo updated its internal policy to ensure compliance in December 2019. Staff was trained to use “missed pickup” category when members complain about not receiving bus passes. DSS provided a copy of the updated internal policy on public transportation grievances.”

Recommendation 46: The Department of Social Services should require Veyo to include Spanish translations when sending Notice of Action letters to members.

Status: Fully Implemented – Veyo translated all notice of action letters into Spanish. DSS approved them in August 2020.

DSS/Veyo Update: “All notices were translated and approved by DSS in August 2020. Veyo sends the approved Language Assistance Notice with all NOAs. Veyo is working with their IT team to fully implement the letters. Contract amendment A4, page 3, H updates Part I, Section I, 8.E to note Spanish translation of NOAs. Refer to 46 - Enclosure 1 - Discrimination is Against the Law.”

Recommendation 47: The General Assembly should consider establishing a taskforce to study and propose solutions for Non-Emergency Medical Transportation bus pass issues. The taskforce members should include: (3) Medicaid recipients who use public transit, at least one of whom represents the behavioral health community, and one who is a parent of a client child, (1) Connecticut transit representative, (1) Non-Emergency Medical Transportation broker representative, (1) Department of Social Services representative, (1) Chair and Ranking Member of the Human Services Committee, (1) Chair and Ranking Member of the Appropriations Committee, (1) Chair and Ranking Member of the Transportation Committee, (1) representative from the Medical Assistance Program Oversight Council, and (1) representative from a Federally Qualified Health Center. The taskforce should promptly report its proposed solutions to the General Assembly.

Status: Partially Implemented – Although the pandemic disrupted the legislative process and the legislation associated with our audit, DSS and Veyo tested the implementation of a reloadable transit card as a possible solution to NEMT bus pass issues.

DSS/Veyo Update: “Veyo is testing the implementation of a reloadable transit card to a small group of members who use public transit. This is in addition to the reloadable CT Transit card in use with some members. Veyo and DSS continually look for opportunities to connect members with public transit in an efficient and effective manner. In addition, there are ample opportunities for DSS and Veyo staff to receive feedback from members who use NEMT services. The MAPOC subcommittee, the Coordination of Care. Includes NEMT services on its agenda for every meeting.”

Recommendation 48: The Department of Social Services should require Veyo to identify members with critical medical needs, and assign a transportation coordinator to properly secure transportation for these members. The department should consider issuing sanctions to Veyo whenever such members experience late or missed medical transportation pick-ups or drop-offs.

Status: Partially Implemented – Although the audit recommended Veyo assign a coordinator to properly secure transportation for members with critical medical needs, DSS and Veyo instead used weekly operations meetings to focus on members with critical and/or challenging transportation needs. We also recommended the use of sanctions. DSS sanctioned Veyo 9 times in March 2021.

DSS/Veyo Update: “This remains a critical area of focus for DSS. The DSS and Veyo weekly operations meetings focus on members with critical and/or challenging transportation needs. These include, but are not limited to dialysis patients, nursing home patients, wheelchair, bariatric and hospital discharges. Sanctions continue to be used by the Department, for example, DSS sanctioned Veyo nine times in March 2021.”

Recommendation 49: The Department of Social Services should require Veyo to properly train drivers on policies and procedures related to transporting children. Those policies and procedures allow parents or guardians to accompany minors traveling to medical appointments.

Status: Fully Implemented – DSS now requires Veyo to properly train drivers on policies and procedures related to transporting children. These policies are included in the Veyo’s Independent Driver and Transportation Provider manuals.

DSS/Veyo Update: “It was previously acknowledged that there was an oversight when updating this specific section of the report. The report was correct. It is standard practice for DSS to review the monthly reports and, as necessary, to seek clarification from Veyo to ensure compliance with all contract requirements. Refer to 49 – Veyo IDP Manual 2020, p. 17-18, Transporting Children; and p.19, Connecticut State Laws; and 49 – 20200109 VEYO Transportation Provider Manual, p.6, section c.; 49 – 3_6 – Provider Meeting Presentation.”

Recommendation 50: The Department of Social Services should require Veyo to amend its policies and procedures manual, transportation provider agreement, and independent driver manual to reflect the requirement that an escort be allowed when a provider is transporting a child client. Veyo should inform and train all Non-Emergency Medical Transportation drivers on the requirement.

Status: Fully Implemented – The Veyo policies and procedures manual now requires that an escort be allowed when a provider is transporting a child client.

DSS/Veyo Update: “It was previously acknowledged that there was an oversight when updating this specific section of the report. The report was correct. It is standard practice for DSS to review the monthly reports and, as necessary, to seek clarification from Veyo to ensure compliance with all contract requirements. Refer to 49 – Veyo IDP Manual 2020, p. 17-18, Transporting Children; and p.19, Connecticut State Laws; and 49 – 20200109 VEYO Transportation Provider Manual, p.6, section c.; 49 – 3_6 – Provider Meeting Presentation.”

Recommendation 51: The Department of Social Services should require brokers to impose specific deadlines to issue medical necessity override decisions.

Status: Not Implemented – DSS does not require brokers to impose specific deadlines to issue medical necessity override decisions.

DSS/Veyo Update: “Veyo follows current contractual requirements related to medical necessity determinations. DSS will consider recommendation in the new NEMT RFP and contract.”

Recommendation 52: The Department of Social Services should require Veyo to reduce the percentage of members required to submit medical necessity forms.

Status: Not Implemented – DSS did not require Veyo to reduce the percentage of members required to submit medical necessity forms.

DSS/Veyo Update: “Veyo follows current contractual requirements related to medical necessity determinations. DSS and Veyo continually review forms and processes in order to simplify and streamline when possible.”

Recommendation 53: The Department of Social Services should expand its rural definition to include the rural counties identified by the United States Office of Management and Budget.

Status: Not Implemented – DSS did not expand its rural definition to include the rural counties identified by the United States Office of Management and Budget.

DSS/Veyo Update: “DSS has not modified its definition of rural counties, but this will be reviewed in April 2021.”

Recommendation 54: The Department of Social Services should require its Non-Emergency Medical Transportation broker to implement a system to automatically acknowledge receipt of the medical necessity form.

Status: Partially Implemented – Veyo currently acknowledges the receipt of a medical necessity form when members provide an email address.

DSS/Veyo Update: “Veyo is currently acknowledging receipt of medical necessity forms when provided with an email address for communication.”

Recommendation 55: The Department of Social Services should require its Non-Emergency Medical Transportation broker to inform both the member and medical provider of the approval or denial of a medical necessity request.

Status: Not Implemented – DSS does not require Veyo to inform the member and medical provider of the approval or denial of a medical necessity request.

DSS/Veyo Update: “Veyo communicates with the medical provider regarding approval or denial when provided with an email address for communication. All medical necessity determinations are documented in the member’s profile. Denials are communicated to the member via the Notice of Action process. Approval is communicated to the member when the member contacts Veyo to schedule the appointment.”

Recommendation 56: The Department of Social Services should require that its Non-Emergency Medical Transportation broker inform both the member and medical provider of the need for resubmission of the medical necessity form.

Status: Not Implemented – DSS does not require Veyo to inform the member and medical provider of the need to resubmit the medical necessity form.

DSS/Veyo Update: “Veyo currently sends notice to the member 30 days in advance with the new form to be completed. Veyo currently cannot notify providers due to instances of a single form being tied to multiple providers; however, Veyo continues to explore internal workflows and technical solutions for resolution.”

Recommendation 57: The Department of Social Services should require Veyo to revise the medical necessity form to allow for the listing of multiple providers.

Status: Fully Implemented – DSS and Veyo changed the medical necessity form in February 2020 to allow for the listing of multiple providers.

DSS/Veyo Update: “DSS and Veyo worked together to make changes to the medical necessity form in February 2020. The CT medical necessity form is currently available on Veyo’s website.”

Recommendation 58: The Department of Social Services should increase the age of a minor child permitted to accompany a member to a medical appointment.

Status: Not Implemented – DSS did not increase the age of a minor child permitted to accompany a member to a medical appointment.

DSS/Veyo Update: “DSS is compliant with CMS requirements.”

Recommendation 59: The Department of Social Services should regularly review the contractor’s performance, and issue a written sanction for each occurrence that the contractor fails to meet the terms of the Non-Emergency Medical Transportation contract. The department should develop a strategy to maximize the effectiveness of sanctions.

Status: Partially Implemented – Although DSS issued more sanctions (9 sanctions in March 2021), the department did not develop a strategy to maximize the effectiveness of sanctions.

DSS/Veyo Update: “The Department agrees that sanctions serve a purpose, but sanctions alone do not necessarily solve an NEMT systems issue. Moreover, Veyo may pass the sanction on to the NEMT driver/company for being late. The Department has issued nine sanctions in March 2021.”