Non-Emergent Medical Transportation (NEMT) and the Transportation Network Companies (TNC) Pilot

Background

The NEMT system in Oregon has faced several complex challenges in both access and quality of service for many years. These challenges directly impact Oregon Health Plan (OHP) members who rely on NEMT for their access to medical care.

In 2022, the Oregon Health Authority (OHA) launched an internal NEMT workgroup to address NEMT challenges. One proposed solution that OHA researched and approved was the TNC Pilot.

During the COVID-19 Public Health Emergency, OHA authorized NEMT brokerages to use TNCs when appropriate and reimburse OHP members when they book TNC rides if their NEMT ride fails to arrive timely. This authorization was set to expire Dec. 31, 2023. Due to the delay in TNC Pilot implementation, OHA has extended this authorization through Dec. 31, 2025.

Vision for the pilot

Implementation:

The pilot started Feb. 1, 2024, for coordinated care organization (CCO) NEMT brokerages. OHA expanded the pilot to allow fee-for-service NEMT brokerages to participate in the pilot beginning June 1, 2024.

Duration:

The pilot will run through the end of calendar year 2025. Participating NEMT brokerages can get ready to begin implementation prior to or no later than Jan. 1, 2025, and proceed to provide data to OHA through Dec. 31, 2025.

Utilization:

Participating brokerages may use TNCs at their discretion if:

- TNCs are the most appropriate mode of transportation per Oregon Administrative Rule (OAR) 410-136-3020 3 (a).
- Regular NEMT providers cannot provide timely rides.

OHP members can opt out or refuse to use TNCs when offered by the NEMT brokerages.

Goals of the pilot

1. Supplement NEMT provider networks in areas where TNC presence is robust, and NEMT provider networks cannot provide timely rides due to supply.
2. Use TNCs as a secondary resource when rides cannot be scheduled or accepted timely through the regular NEMT provider network. This includes when NEMT providers make same-day cancellations and the brokerage cannot timely book another ride.
3. Reduce the number and rates of:
    - Late NEMT rides.
    - Unscheduled rides.
    - Provider no shows.
    - Provider cancellations.

Pilot process

Participating NEMT brokerages would:

- Directly contract with the participating TNCs.
- Book and pay for rides directly with the participating TNCs.

- Reach out directly to the participating TNCs for technical assistance or support. They may also contact OHA staff for support as needed.

Pilot data

- OHA will collect data with pilot participants through the duration of the pilot.
- Quarterly performance metrics data will include new metrics relevant to the pilot for data gathering and analysis.

Evaluation of the pilot

OHA will collect and analyze data throughout the pilot. OHA will solicit community and partner feedback via multiple channels such as the NEMT Technical Advisory Committee (TAC), community partners, CCOs, brokerages, providers, Community Advisory Councils and quarterly CCO NEMT meetings.

- Once the pilot ends, OHA will review overall results and feedback to determine:
  - Whether the pilot meets the stated goals, and
  - If OHA should continue to allow TNCs to operate within the NEMT provider network structure.
- OHA will complete the evaluation during the first quarter (January-March) of 2025 with input from the NEMT TAC.

Pilot rules

OHA updated OARS under Oregon Health Plan and Medical Transportation Services in January 2024.

- OAR 410-136-3020, and
- OAR 410-141-3920

Recently updated as well as currently proposed rule changes address specific TNC requirements and do not change general NEMT requirements.

Frequently asked questions

Is participation in the pilot mandatory?

OHA strongly recommends participating in the pilot, especially in areas with TNC presence.

Do brokerages need to use a specific TNC during the pilot?

No. Uber and Lyft are both TNCs in Oregon approved for the pilot.

- On April 18, 2024, OHA approved Uber's application.
- On May 17, 2024, OHA approved Lyft's application.

How will OHA know which brokerages will participate in the pilot?

Brokerages should contact Michelle Meuwissen michelle.m.meuwissen@oha.oregon.gov (503-551-4973) to express interest in participating.

What is the ideal population that could utilize the TNCs?

The recommended population is ambulatory members who do not need hand-to-hand assistance.

Can TNC drivers on the exclusion list participate, since NEMT is funded by Medicaid?

No, they cannot. TNCs screen out drivers on the exclusion list during the background check process.

How will complaints be addressed? Directly with the driver, a representative from the TNC, somewhere else?

Similar to NEMT rides, complaints would go to the CCOs and brokerages.