

MONTACHUSETT REGIONAL TRANSIT AUTHORITY (MART)

BROKERAGE DEPARTMENT

QUALITY ASSURANCE AND INTEGRITY PLAN

FY2023

**MONTACHUSETT REGIONAL TRANSIT AUTHORITY (MART)
BROKERAGE DEPARTMENT
QUALITY ASSURANCE AND INTEGRITY PLAN
FOR HUMAN SERVICE TRANSPORTATION (HST)**

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Consumer Access

Toll Free Numbers: 800-854-9928, 866-834-9991, 866-834-9992
Local Access Number: 978-353-0333

Outside of normal business hours, the toll-free numbers provide a recorded message for consumers to transfer to our answering service for assistance with emergencies. The answering service is staffed after hours, weekends and holidays by operators that follow specific procedural directives and have access to a 24-hour MART contact person.

MART contracts with a language line company for translation services, which can be accessed as needed.

Confidentiality

All MART employees are under a confidentiality clause.

Trip Scheduling & Transportation Provider Verification Procedure

MART schedules trips via a computerized, integrated transit management system (ITMS). MART primarily uses an automated mapping program which is integrated into ITMS to determine mileage, rate and transportation provider selection via our low-cost bid system for MassHealth and ICO trip scheduling. MART schedules all DDS, DMH and DPH consumer trips using ITMS, routes are assigned to the low-cost qualified transportation provider at the beginning of the contract period following the RFP. Additional consumers are assigned to routes following a full review of the transportation request and all available options. New routes are added when required and are awarded via a low cost, qualified vendor bid process upon approval of the agency and HST.

MASSHEALTH/ICO Scheduling & Trip Verification– MART schedules all MASSHEALTH trips via ITMS, which is programmed to only schedule trips that have a valid PT1 form in the system. A daily MASSHEALTH Consumer Eligibility application is run, and ineligible trips are automatically cancelled through the program. Authorized scheduled trips are transferred from ITMS to transportation provider invoices to ensure MART authorization of trips billed. MART conducts surveys and regular random sampling of trips monthly and throughout the year to ensure trip verification, as well as timely and satisfactory service.

DDS/DAYHAB/ICO/DMH Scheduling & Trip Verification – MART utilizes ITMS which contains all client information and route scheduling for agency programs. This application allows MART to work in conjunction with transportation providers to better manage new and existing routes, and overall scheduling of DDS, DAYHAB, ICO and DMH consumers. MART receives route sheets from Transportation Providers, as needed, to verify passengers scheduled on each route and to update ITMS. Authorized scheduled trips are reviewed against Transportation Provider invoices to ensure MART authorization of trips billed. MART conducts surveys and regular random sampling of trips monthly and throughout the year to ensure trip verification, as well as timely and satisfactory service.

DPH Scheduling & Trip Verification – MART reviews all driver sheets monthly to ensure all sheets were signed and verified by Program Staff. Student eligibility dates and schedules are continually monitored. MART utilizes ITMS which contains all client information and route scheduling for the DPH/EIP Program. This application allows MART to work in conjunction with Transportation Providers to better manage new and existing routes, and overall scheduling of DPH/EIP consumers. Authorized scheduled trips are reviewed against Transportation Provider invoices to ensure MART authorization of trips billed. MART conducts surveys and regular random sampling of trips monthly and throughout the year to ensure trip verification, as well as timely and satisfactory service.

MRC AND MCB Scheduling – MART schedules all trips from requests made by the agencies and all trips are verified against the transportation requests. Transportation Providers submit price quotes, and the price quotes are then submitted to HST for final approval by the agencies.

Verification of Billing

MASSHEALTH, ICO, DDS, DMH and DPH – The ITMS program used by MART automatically assigns a unique trip ID number. Payment to Transportation Providers is denied for any billed trip that does not have a trip ID number. ITMS generates invoices for all completed trips and invoices are then posted to the Transportation Provider via MART’s Vendor Portal, which is a secure web-based application. Transportation Providers then review and authorize their invoice/s for all work provided to MART. MART reviews and approves or denies any adjustments made and following MART approval, the Transportation Provider then generates the final invoice cover sheet.

MRC and MCB – Transportation Providers submit back up and invoice coversheets on a monthly basis which are then verified by MART staff against the original requests and the cancellations received by the agencies. Any discrepancies are then sent back to the Transportation Provider for correction. Transportation Providers invoices are then processed following MART’s final approval. Agency invoices are then prepared by MART and sent to HST to be verified and approved and forwarded to the appropriate agency for payment to the broker.

Data Protection & Backup

MART has various virus and data protection applications and protocols in place to ensure the safety and integrity of client databases and programs. These applications and protocols are routinely updated. Backup of data is performed on a regular basis and kept offsite. Data is password protected. All paperwork is kept in locked cabinets when not in use. Offices are kept locked, and all visitors must pass through a checkpoint to be signed in and issued a visitor’s badge.

CORI Checks

All Transportation Providers must certify that **annual** CORI checks are conducted on all drivers, attendants/monitors and any other personnel that have contact with HST consumers and that CORI results are in compliance with EOHHS CORI guidelines.

Broker/Management Responsibilities

As a Broker, it is MART’s responsibility to subcontract with Transportation Providers to provide transportation services, monitor and maintain contract compliance, ensure the provision of quality customer service and Transportation Provider service delivery, monitor administrative activity, ensure accurate billing/financial transactions/cost-effective rates and resolve issues/concerns that may arise.

Transportation Provider - Audits

Random audits are conducted as required by the contract. Audits are performed annually and when required, for specific consumer needs or in follow up to specific complaints or as necessitated for other issues. Audits are conducted to monitor and ensure vehicle compliance, administrative compliance and driver/monitor compliance.

Procedures for Audit and Inspections:

The Audit and Inspection process is required to be completed for any newly contracted Transportation Provider prior to any work being assigned to them. Additionally, MART Inspectors are required to perform a minimum of one audit per year on all contracted Transportation Providers. Inspectors must schedule an appointment with the Transportation Provider in advance for a mutually agreed upon date and time. This is essential as the Transportation Provider's designated CORI certified individual with access to personnel files and CORI's must be present. The inspector is required to go through all the Transportation Provider's records to make sure that they are in compliance with all the appropriate standards. It is the inspector's responsibility to complete the following required documents: MART Broker Annual Subcontractor Desk Inspection Form. This form is verification that the Transportation Provider has all necessary contractual requirements in place for all Broker managed programs that they are providing service for. This form must be completed in its entirety and signed by both the Inspector and the Transportation Provider. Inspectors are then required to go through all the personnel files of transportation provider personnel associated with MART contracted work. The Inspector must complete the Personnel (Driver/Monitor) file Checklist for each driver/monitor associated with the contract. This form is a verification that the Transportation Provider's employees associated with the contract are in compliance with all the necessary requirements. Once completed this form is required to be signed by the Inspector and the Transportation Provider. If any employee of the Transportation Provider does not have requirements in place the Inspector has the right to suspend and/or remove that individual from providing services. It is the Inspector's responsibility to submit the entire package to the appropriate Program Manager for review and any additional follow-up required.

Procedures for Field and Vehicle Inspections:

MART Inspectors are required to perform, at minimum, the appropriate number of inspections for the year required by MART's contract with EOHHS/HST. Inspectors are to arrive at a facility, show their identification and explain to the facility staff what they are there to do and why. Inspectors need to check with facility staff on site to see if they have any transportation related issues or concerns to report.

Inspectors are required to observe the Transportation Provider's pick up and/or drop off at the residence or facility. Inspectors are to note and/or address the following: time violations, driver/monitor interaction with the consumer as well as the driver/monitor interaction with the residence or facility staff.

Inspectors are to complete the MART Inspection Reports in its entirety and perform a full vehicle inspection. If at any time the Transportation Provider's vehicle and/or driver/monitor are in serious violation of the standards, the Inspector has full authority to immediately remove the vehicle, driver or monitor from providing service. This information is immediately relayed to the appropriate manager and proper trip accommodations are to be made. Inspection forms are required to be signed by the driver (and monitor when applicable).

It is the responsibility of the Inspector to submit the vehicle inspections to the appropriate MART Program Manager for review and any additional required action or follow-up.

In follow-up to specific incidents or issues, Managers may require that the Inspectors simply observe a specific route or consumer pick up/drop off. In these cases, the Inspector will arrive at the facility and/or residence for observation only - no introductions or vehicle inspections should be performed. Inspector must immediately follow-up with the Manager and report on their observations.

Verification of Non-Compliance

Verification of non-compliance is obtained by MART in a number of ways. Some instances of non-compliance can be obtained directly from the Broker inspections and/or audits. When issues are obtained and directly witnessed in this manner, no further verification is required, and immediate actions are taken in accordance with the appropriate disciplinary action. Non-compliance issues are also obtained via complaints, surveys and sometimes anonymous reports. In situations such as this, to verify the allegation MART makes every attempt to obtain as much additional information as possible. This is accomplished in a number of various ways: contacting facilities, other consumers or individuals that may have been present as a witness or implementing an increased number of inspections on a specific Transportation Provider to verify the non-compliance. Appropriate action is then taken with the Transportation Provider. Actions taken are sometimes outside of the normal schedule of fines and actions depending on the severity of the violation.

Complaint Resolutions

Complaints received at MART are numbered and stored into a Quality Management System. Complaint Reports are continually monitored to ensure timely management, satisfactory resolution and appropriate disciplinary action/penalty assessment. Complaints of a serious nature are immediately brought to the attention of the appropriate Manager for review and disciplinary action. In addition, MART provides a consumer satisfaction survey to Programs and consumers to assess overall satisfaction and address any deficiencies noted. Following is a further description of the procedures to follow in regard to reporting misconduct and corrective action plans for resolution.

The source of a complaint could be second or third hand; oral or written, of a suspicious nature, from a proven source, etc. It may be unclear as to whether a violation did in fact occur or what the actual facts of the situation were. Therefore, it may be necessary for the Broker to obtain an additional verification of facts, unless one of the following applies:

- The Transportation Provider admits to the violation
- There is objective evidence of a violation (GPS tracking data, etc.)
- MART, HST or Agency Staff actually witness the violation

Additional verification sources can include the following: reports from police, facility staff, health provider staff and consumers.

All complaints will require MART to complete and submit an incident report against the Transportation Provider. MART will place complaints and all related documents in the Transportation Provider's performance file, this will allow an audit trail to be followed pertaining to resolution of the matter, as well as to monitor Transportation Provider performance.

Reporting

The HST office will be notified immediately of all critical incidents.

Action Plan

An Action plan may be developed consisting of some of the following elements: training of the Transportation Provider's management/operating personnel, drivers/monitors; required to bring in the vehicle to Broker's facility for inspection; preparation of written procedures to correct issues; production of documentation concerning disciplinary actions taken; development an effective hiring plan to reduce turnover; demonstration of a required safety function such as securing of wheelchair and development of a safety plan. It is at the discretion of the Broker to determine other requirements as deemed appropriate.

When a single Type B violation or a number of Type A violations (both are detailed below) have been registered against a subcontractor and upon investigation, the facts of these complaints cannot be substantiated and therefore there is no proof, a voluntary separation of the consumer and Transportation Provider may be warranted. This is done to serve the consumer, as well as the Transportation Provider. The consumer is no longer exposed to the worrisome environment and the Transportation Provider is no longer exposed to the risk of additional complaints. The Transportation Provider is not penalized by this action. This practice recognizes the fact that cultural and other biases may and often do occur in human interaction. It also recognizes the importance of the consumer's sense of well-being while being transported. One of our goals is to provide a positive experience for consumers. In the case of an allegation of abuse or other severe misconduct, the Transportation Provider, at the Broker's request, will remove the driver from all human service transportation.

Type A violations are considered to be shortfalls in management performance that do not pose an immediate risk to the health and well-being of Consumers or the financial integrity of operations and state reporting. They are non-willful and non-systematic violations.

Three Type A violations, which may be within one occurrence/event within a single contract year.

Stage 1: The 1st Type A violation which may be within one occurrence or event, withing a single contract year.

Potential Contract Actions:

- \$150 fine
- Trip Value Fine (does not apply to DDS)
- Route Value Fine (per day disallowance)
- Action Plan Requirement
- Written Warning to Transportation Providers
- Notice to Transportation Provider 's File (a permanent file)
- Training Requirement
- Active Monitoring
- Brokerage Follow-up
- Transportation Provider's past performance filing (a one-year file)
- Reduction in work/loss of consumer(s)

Stage 2: More than 3 Type A violations, within a single contract year or failure to properly retain/maintain records in paper or electronic form for 7 years.

Potential Contract Actions:

- \$300 fine
- Trip Value Fine (does not apply to DDS)
- Route Value Fine (per day disallowance)
- Action Plan Requirement
- Written Warning to Subcontractor
- Notice to Subcontractor's Permanent File
- Training Requirement
- Active Monitoring
- Brokerage follow-up
- Transportation Provider past performance filing (a one-year file)
- Loss of consumer/s
- Potential Suspension
- Potential Termination

Quality Assurance & Integrity Plan

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MART reserves the right to adjust fine structure and potential contract actions based on the severity or frequency of the violation(s).

Type B violations include shortfalls in management performance that may affect the health and well-being of Consumers and/or the financial integrity of operations and state reporting. Type B violations may include violations done knowingly or which permeate the entire operation.

Stage 1: Single Type B Violation of Contract Standards

Potential Contract Actions:

- \$250 Fine
- Trip Value Fine (does not apply to DDS)
- Route Value Fine (per day disallowance)
- Loss of consumer
- Loss of Route
- Action Plan
- Written Warning to Subcontractor
- Notice to Subcontractor's Permanent File
- Active Monitoring
- Brokerage Follow-up
- Transportation Provider past performance filing (a one-year file)
- Potential Suspension
- Potential Termination

Stage 2: Multiple Type B Violations of Contract Standards, within a single contract year.

Potential Contract Actions:

- \$500 Fine
- Trip Value Fine (does not apply to DDS)
- Route Value Fine (per day disallowance)
- Loss of consumer
- Action Plan
- Written Warning to Subcontractor
- Notice to Subcontractor's Permanent File
- Active Monitoring
- Brokerage Follow-up
- Reduction in services
- Transportation Provider past performance filing (a one-year file)
- Potential Suspension
- Potential Termination

MART reserves the right to adjust fine structure and potential contract actions based on the severity or frequency of the violation.

MART reserves the right to impose fines/penalties for any contract violation that may not be included in the list of infractions listed below:

The following are examples of what may be considered a Type A Violation:

- Failure to conduct operations in a courteous manner
- Failure to report and invoice properly
- Failure to conduct operations in proper attire

The following are examples of what may be considered a Type B Violation:

- Transport to unauthorized locations
- Transport unauthorized persons
- Failure to properly suspend services during inclement weather
- Failure to safely board, secure, transport, monitor, supervise and debark consumer
- Failure to release consumer to authorized person
- Failure to properly hire personnel
- Failure to perform proper incident reporting and processing
- Failure to operate vehicle in a safe manner
- Failure to operate proper vehicles
- Failure to obtain and provide proper training
- Failure to maintain personal data confidentiality, security and proper use
- Failure to maintain correct Worker's Compensation insurance
- Failure to maintain constant supervision of consumer (except when program staff is available assisting passengers)
- Failure to indemnify, hold Commonwealth harmless
- Failure to correct negative safety reports within a reasonable time period
- Failure to comply with and implement changes in laws
- Failure to assign monitors
- Failure to properly report and process abuse
- Failure to have back up vehicle available as required by contract
- Failure to provide on-time transportation
- Failure to transport (no show)
- Contact consumer in an unauthorized manner
- Drivers smoking in the vehicle
- Lack of communication, language barrier
- Unable to contact vendor dispatch
- Vehicle(s) have mechanical issues, are dirty and smell like smoke