



Colorado
Cross-Disability
Coalition

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Comments on Non-Medical Transportation Rates from the Colorado Cross-Disability Coalition March 2017

What is it? Non-medical transportation is a very important HCBS benefit. It provides clients either two round trip, or four one way trips per week. This is in addition to trips to and from adult day care. For clients unable to drive or unable to afford a car, that live in areas without public transportation this is an essential benefit. Clients are allowed to use their rides on an annual PAR, so if a client is unable to tolerate cold the client could do more activity in the summer and less in the winter.

Why is it important? Getting out of one's house is imperative. Health outcomes are better when people leave their home, whether for shopping, errands, or to participate in social, civic, or faith based activities. This can also support limited employment or volunteer work. Most people on these waiver programs are low-income and cannot afford a lot of transportation.

Current Concern: People that use power wheelchairs have the fewest options for private transportation. Most taxis do not have lifts, and the few that do have lifts are always in demand. Even in the urban areas where there are many more options, people that require a lift equipped vehicle often wait between 2 and 5 hours, particularly if the request is on demand, but even if the request is scheduled. Rural clients have even fewer options. Because of PUC licensing there are vehicles classified as wheelchair or mobility vans. In the NEMT program to get a lift vehicle a doctor has to verify the need. In the NMT the case manager verifies the need. Someone that can walk can get to the taxi, open the door, sit down and go. When they get to their destination the person gets out. A few clients may need some guidance to the door of the building, due to visual issues or frailty or cognitive issues but this is infrequent and does not take a lot of time. Getting someone in or out of a wheelchair van is not fast or easy. Most clients that use this service that are not able to use a bus require someone to go to their door and assist then onto the van. The client must be positioned properly and the driver must put 4 tie downs into a track on the floor and secure the chair. To do this requires a lot of bending and moving in an awkward position. If the wheelchair does not have brackets for tie downs it is even more difficult. The same process has to happen at the other side. If there is snow the driver must often move the snow out the way. The driver has to deploy and stow the lift, a process that is between 3 and 10 steps depending on the type of van. It is rarely practical to have more than one client in a vehicle at a time for a variety of logistical reasons especially in rural Colorado. Wheelchair vans are not allowed to pick up people other than wheelchair users per PUC rules.

The rate for wheelchair services is less than the rate for taxi cabs and far less than the rate for the exact same service under NEMT (Non-Emergency Medical Transportation). So a provider may take the same client to the same location on two days, one day it for a doctor appointment the next day to go shopping and they get far less on day two.

There are three rate bands for NMT:

- 1=up to 10 miles \$9.89 per trip (one way)
- 2=11-20 miles \$18.51 per trip
- 3=over 20 miles \$25.21 per trip

A ten mile taxi ride in Denver is about \$30 and maybe more if sitting in traffic. A taxi ride from Colorado Springs to Pueblo (45 miles) is \$110

Example showing the inequity:

A provider in Grand Junction serves client in Palisade. The provider has to first get to the client (12.5 miles away with no fee for the deadhead time). The provider is taking the client to Grand Junction for errands, church, etc. This trip is 12.5 miles and takes 18 minutes in normal circumstances. The provider also has an average 7 minutes (between 5 and 10 minutes) for loading and another 7 minutes for unloading the wheelchair and stowing and folding the lift.

Time involved:

18 minutes to get to client + 7 minutes to load client + 18 minutes to drive to Grand Junction to location of client activity + 7 minutes to load client =50 minutes they get \$18.51 for this one way trip.

If the client is going to do an errand or attend a 45 minute church service the provider may not have another client to transport in that short amount of time. So there may be some dead space and then the process repeats. (A typical taxi could likely find another fare).

With no other job in between, the time spent on this client is likely 145 minutes at with a **total fee of \$37.02**. This is 2.4 hours with an hourly rate of \$15.42. After mileage, there is not even enough to pay minimum wage! Mileage at state NEMT rate of 77 cents a mile is \$19.25. The NEMT mileage leaves \$17.77 for salary or \$7.40 an hour

Now let's consider this same service for a person who walks-using a taxi.

A taxi in Grand Junction charges \$1 per deadhead mile and \$3 per mile (or 30 cents per 1/10 of a mile for trips under 100 miles). They get \$4 for the flag. So for the same service the taxi charge is: \$4 +\$18 from Grand Junction to Palisade + \$37.50 from Palisade to Grand Junction + \$37.50 from Grand Junction back to Palisade. **Total fee of \$97**

Please consider:

- a) It would be easier for a non-wheelchair taxi that can pick up anyone and do other business to pick up a fare while waiting for the client.
- b) The driver also has close to 15 minutes less work and does not have to do the hard, heavy work of securing a wheelchair.
- c) Wheelchair vans are also less fuel efficient and have additional maintenance costs because of the lift and securement areas.

In other words, it costs more to run a wheelchair van than a regular taxi AND drivers require more training and must be more physically fit. However we pay wheelchair vans 38% of what we pay a taxi for a non-disabled person.

Requested Change:

Option One: Wheelchair vans should be paid at least the same rate as taxis for NMT. There are areas of the state that do not have any wheelchair vehicles, and other areas where there is only one provider. The low rates gives even the most dedicated of providers pause as they will surely lose money.

Option Two: Make the NMT the same as NEMT. NEMT pays a base rate of \$19.54 plus .77 cents per mile.

Option Three: If neither the taxi rate nor NEMT rate can be used, at the very least the following should be considered:

- a) Allow for deadhead time in rural communities
- b) If client will be in location for less than an hour allow a “wait time” rate add on if the provider is not able to pick up other fares (e.g. only licensed to carry wheelchairs).
- c) Instead of bands use miles or at least have mileage add on for trips over 35 miles.
- d) Pay a load and unload fee.