



OPERATIONAL MEMO

TITLE:	COUNTY TRANSITION OF NON-EMERGENT MEDICAL TRANSPORTATION (NEMT)
SUPERSEDES NUMBER:	N/A
EFFECTIVE DATE:	JUNE 1, 2020
DIVISION AND OFFICE:	COMMUNICATIONS AND GOVERNMENT RELATIONS, POLICY, COMMUNICATIONS AND ADMINISTRATION OFFICE
PROGRAM AREA:	COUNTY RELATIONS AND ADMINISTRATION
KEY WORDS:	NEMT, TRANSITION, INTELLIRIDE, STATEWIDE VENDOR
OPERATIONAL MEMO NUMBER: HCPF OM 20-074	
ISSUE DATE: JULY 21, 2020	
APPROVED BY: RACHEL REITER	

HCPF Memo Series can be accessed online: <https://www.colorado.gov/hcpf/memo-series>

Purpose and Audience:

The purpose of this Operational Memo is to inform county departments of human/social services and Non-Emergent Medical Transportation (NEMT) administrators of operational instructions to transition NEMT duties to IntelliRide, the new statewide NEMT vendor.

Information:

Non-Emergent Medical Transportation (NEMT) is a benefit provided to Health First Colorado (Colorado's Medicaid program) members without transportation to important medical appointments. Historically, the benefit was administered in the nine front range counties by IntelliRide, and by other transit entities in the remaining 55 counties.

Through a competitive bid process, IntelliRide was selected as the new statewide vendor for the NEMT program. **On July 1, IntelliRide will begin transitioning management of NEMT across the state.**

The Colorado Department of Health Care Policy & Financing (the Department) provides this operational guidance to facilitate the transition of duties from county departments to IntelliRide and to ensure seamless NEMT benefits for members.

Transition Date for Services

There will be no changes in the nine counties already using IntelliRide (Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, Jefferson, Larimer and Weld counties).

For the remaining counties, IntelliRide will begin managing trips on either July 1 or Aug. 1.

- In counties transitioning July 1, members should begin contacting IntelliRide for rides immediately.
- In counties not transitioning until Aug. 1, members should continue to contact the county for trips occurring in July and call IntelliRide to schedule trips for Aug. 1 or later.

Transition statewide should be complete by August 2020. More information on transition status by county can be found on the NEMT webpage at CO.gov/HCPF/NEMT. Members should be directed to HealthFirstColorado.com/NEMT.

IntelliRide continues to work diligently toward enrolling existing NEMT providers into the new statewide network.

Counties that use an existing broker model are being prioritized and will be transitioned on July 1. IntelliRide will both field calls and schedule trips for those counties beginning July 1.

Counties and regional brokers that completed these steps by noon June 29 are scheduled to transition July 1:

- share member trip data with IntelliRide
- submit a signed provider agreement and Business Associate Addendum (BAA) to us.join_our_network@transdev.com

Counties not onboarded with IntelliRide by July 1 should continue to provide NEMT services and should not reallocate staff who handle NEMT requests until their transition is complete. These counties should schedule trips occurring and provide transportation occurring in July.

Sharing of Protected Health Information (PHI) Data by Counties with IntelliRide

County departments of human/social services act as the agent of the Department to administer the Medical Assistance Program and related activities in the respective counties in accordance with state statute (C.R.S. 25.5-1-118) and rules of the state

department. Transport services are within the definition of administration of the Medical Assistance Program and/or related services.

HCPF is directing all county departments that currently administer NEMT to provide all requested information to IntelliRide. IntelliRide is the Department's vendor and business associate. IntelliRide is responsible for providing all NEMT services statewide for enrolled members, including customer service, trip scheduling, eligibility verification, trip dispatch and routing, transportation provider credentialing, training and education, trip monitoring, quality assurance, contract compliance and claims.

To complete the statewide transition, local county offices and regional brokers must share member trip data scheduled for Aug. 1 and beyond (both subscription and individual trips) with IntelliRide. This information must be submitted by Friday, July 24 via encrypted, secure email to intelliride@transdev.com or by fax at 720-302-0106.

The Department's goal is a smooth transition from the county administration to IntelliRide and ensure that members receive seamless services. IntelliRide must have member information, including member Protected Health Information (PHI), for those who are utilizing NEMT currently arranged by the county and/or transit providers the county has contracted with. The need for the disclosure of information will last for the transition period of the NEMT expansion.

Sharing of PHI is in compliance with the Department's confidentiality rules, found at 10 CCR 2505-10 8.100.3N, which states that "[t]he eligibility site must obtain permission from a family, individual, or authorized representative, whenever possible, before responding to a request for information from an outside source, unless the information is to be used to verify income, eligibility and the amount of Medical Assistance payment. This permission must be obtained unless the request is from State authorities, federal authorities, or State contractors acting within the scope of their contract." **Because IntelliRide is the Department's contractor, acting within the scope of their contract, sharing of member PHI is allowed per rule.**

When IntelliRide is fully operational as the transportation broker in all 64 counties, it will obtain confirmation of eligibility for transportation services in the customary manner for enrolled providers through the Provider Portal. When sending PHI, the county must ensure that the information is sent via encrypted email or other secure method.

Sharing of Protected Health Information (PHI) Data to Providers with IntelliRide

Both during transition and after implementation, IntelliRide will communicate with Health First Colorado-enrolled providers about patient appointments as required in the scope of work specified in the contract with Department. The information to be shared will include PHI. IntelliRide is the Department's contractor and a business associate, and

therefore a provider may disclose PHI to IntelliRide in accordance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

County Administration Expenditures for NEMT

Once the transition from county departments of human/social services or regionalized transportation brokers occurs (depending on the county, either July 1 or Aug. 1, 2020), NEMT administrative expenditures will no longer be considered eligible for reimbursement of federal and state funds through county administrative funding. Administrative expenditures related to NEMT incurred after the county's transition that are submitted to the County Financial Management System (CFMS) will no longer be eligible for reimbursement. As with all expenditures submitted for reimbursement, CFMS submissions may be subject to audit to ensure NEMT expenses are no longer being charged to county administration.

There may be certain situations where the Department may allow certain expenditures to be reimbursed with federal and state funds to facilitate the transition of work from the county to IntelliRide. These circumstances will be to ensure no negative impact to members. Prior written approval must be granted by the Department based on a specific request from the county. Requests of this type should be sent to HCPF_CountyRelations@state.co.us. Written approval will only be granted at the Department's discretion; HCPF will contact those counties that may be eligible for this process. All approvals must be maintained with county administrative expenses for audit purposes.

In addition, all mileage reimbursements for trips after July 1 should be submitted to IntelliRide regardless of when your county is transitioning. Details of how to submit reimbursement forms are available on the NEMT webpage.

Member and County Communications

The best resource for members is the NEMT page on the Health First Colorado website at healthfirstcolorado.com/nemt.

County resources are available on the Department's NEMT webpage at CO.gov/HCPF/NEMT, including frequently asked questions. A [County Directors Special Notice](#) was issued to counties in July 2020 that included all resources currently available to counties. Communications of these types will continue to county directors and through the County Connections newsletter as additional resources become available.

Attachment(s):

None

Department Contact:

NEMT@state.co.us – for questions about the NEMT program

HCPF_CountyRelations@state.co.us – for questions about county administration