PASSENGER VERIFICATION IN LIEU OF SIGNATURE

BSR/NEMTAC 1006-202X

This standard establishes methods to verify the presence of passengers receiving non-emergency medical transportation (NEMT).

Version 1.0

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INTRODUCTION

The Non-Emergency Medical Transportation Accreditation Commission® (NEMTAC) takes a pioneering step in defining the essential standards for Non-Emergency Medical Transportation Providers. With a commitment to ensuring quality and professionalism across the industry, NEMTAC establishes this comprehensive document as a baseline, setting expectations for service excellence regardless of the geographic location of the organization. This standard not only reflects our dedication to elevating the standards of care in non-emergency medical transportation but also serves as a testament to our mission of fostering a uniform and high level of professionalism within the NEMT sector.

NEMT Organizations should designate a specific section of this standard to be used by their organization as the method for passenger and trip verification by policy.

REVISIONS

The Certification and Standards Advisory Committee welcomes proposals for revisions to this standard. Revisions are made to the standard periodically (usually within five years from the date of the standard) to incorporate changes that appear necessary or desirable, as demonstrated by experience gained from the application of the standard. Proposals should be as specific as possible, citing the relevant paragraph(s) by number, the proposed wording, and the reason for the proposal. Supporting documentation would enable the Committee to process changes in a timely and efficient manner.

INTERPRETATIONS

Upon written request to the Certification and Standards Advisory Committee, will an interpretation of any requirement of the standard be made. The request for interpretation should be clear citing the relevant paragraph number(s) and phrased as a request for clarification of a specific requirement. Oral interpretations are not provided.

COMMITTEE MEETINGS

The Certification and Standards Advisory Committee meets monthly. Any person wishing to participate should contact the Executive Director of NEMTAC for information.

STANDARDS APPROVAL

Language to be added when approved

SCOPE

NEMTAC recognizes the necessity of adopting technological methods for verifying passenger transport instead of relying on a physical signature. The COVID-19 pandemic highlighted the widespread use of alternative signature collection methods, leading to more precise verification of passenger identity during transportation services. This initiative aims to set a technology standard for confirming the pick-up and drop-off of passengers at designated locations for NEMT trips.

PURPOSE AND APPLICATION

The purpose of the definitions outlined in this standard are designed to apply to all areas of non-emergency medical transportation (NEMT) from transportation provider, through brokers, payors, and regulators to ensure the consistency of language used across the industry.

EXCEPTIONS

No exceptions have been identified in the delivery of non-emergency medical transportation services to the public.

INTERPRETATIONS

Upon written request to the Certification and Standards Advisory Committee, interpretations of any standard requirement shall be provided. Requests for interpretation must be clearly articulated, citing the pertinent paragraph number(s), and formulated as inquiries seeking clarification on specific requirements. It is imperative to note that oral interpretations will not be furnished.

DEFINITIONS

Datetimestamp – A "datetimestamp" as a data field typically refers to a field in a database or a data structure that stores both date and time information together. It combines a date (typically in the format YYYY-MM-DD) and a timestamp (typically in the format HH:MM) to represent a specific point in time. This combined field is useful in applications where both the date and the exact time of an event or record creation are important and need to be stored or queried together. Here's a concise definition:

Datetimestamp: A data field that combines a date and a timestamp to represent a specific point in time, typically formatted as YYYY-MM-DD HH:MM:SS

Fraud, Waste & Abuse - Fraud, Waste, and Abuse (FWA) are terms commonly used in the context of healthcare and other industries to describe inappropriate actions that result in unnecessary costs or the misappropriation of resources. Understanding these concepts is crucial for maintaining integrity and efficiency in systems like healthcare programs, insurance, and government services.

GPS- GPS stands for Global Positioning System. It is a satellite-based navigation system that provides location and time information anywhere on or near the Earth where there is an unobstructed line of sight to four or more GPS satellites.

Health Insurance Portability and Accountability Act (HIPAA) - The Health Insurance Portability and Accountability Act (HIPAA) is a United States federal law enacted in 1996 designed to protect sensitive patient health information from being disclosed without the patient's consent or knowledge. HIPAA establishes a set of standards and regulations for the handling, storing, and sharing of medical information to ensure the privacy and security of individuals' health data.

Identification – Identification generally refers to the process or act of establishing or confirming the identity of a person or entity. It involves presenting or verifying information that uniquely distinguishes an individual or thing from others. Identification approved by organization policy or program as documented in policy and procedure may be accepted by a NEMT Provider.
Medical Identification Number

NEMT Driver - A Non-Emergency Medical Transportation (NEMT) driver is a professional responsible for transporting individuals who require medical-related transport but do not need emergency medical care during the trip.

NEMT Provider - A Non-Emergency Medical Transportation (NEMT) Provider is an individual or organization responsible for providing and managing non-emergency medical transportation services. NEMT operators coordinate and oversee the transportation of patients who need to attend medical appointments, treatments, or therapies but do not require emergency medical care during transit.

NEMT Passenger - A Non-Emergency Medical Transportation (NEMT) passenger is an individual who utilizes transportation services specifically designed to help people access medical care and services. These passengers typically require assistance with transportation due to medical, physical, or cognitive conditions that prevent them from using regular means of transport.

NEMT Trip - NEMT Trip refers to a trip provided by a Non-Emergency Medical Transportation (NEMT) service. NEMT trips are specifically designed to transport individuals who require transportation for medical assistance or supervision but do not have an emergency medical condition that necessitates the use of an ambulance.

Unique Identifier – May be Insurance Number, Date of Birth, or a software generated identification number to identify a unique person or individual.

1006.1 Remove Signature As Standard Of Validation.

Signatures can be subject to forgery and/or rarely verified, and factors such as the need for touchless interactions due to the potential for transmission of infectious agents have underscored the drawbacks of this traditional method. Embracing technological solutions for passenger identification not only enhances accuracy but also addresses the changing demands for contactless and secure verification in Non-Emergency Medical Transportation.

1006.2 Use of Facial Recognition & Biometrics Technology

While acknowledging the advancements in technology, including facial recognition and other biometrics, it is currently not recommended for widespread implementation within the Non-Emergency Medical Transportation (NEMT) industry. This cautious approach is rooted in concerns related to both cost implications and privacy issues associated with the use of such technologies. The affordability and practicality of integrating facial recognition and biometrics into the NEMT sector are crucial considerations. Currently, the industry opts for more cost-effective and privacy-sensitive alternatives. However, as these technologies become more accessible and their ethical and privacy standards mature, their consideration for implementation in the NEMT industry will be revisited in the future.

1006.3 Use Of GPS Equipment In The NEMT Vehicle

To ensure the validation of NEMT Trip completion, the current standard involves the utilization of GPS technology in NEMT vehicles. GPS data can be acquired within the vehicle through either installed equipment or an application installed on a phone or tablet carried in the vehicle. This application is dedicated to recording trip information and is affiliated with the organization responsible for delivering the transportation services. It is imperative to emphasize adherence to passenger privacy statutes when handling data associated with non-emergency medical transportation, highlighting the importance of maintaining confidentiality and safeguarding sensitive information.

Examples of evidence to meet compliance:
The organization uses GPS device in each vehicle connected to a software platform which links the vehicle activity to the NEMT Trips.

1006.4 Vehicle Identification Verification

To ensure compliance with vehicle requirements, all vehicles must be identified using the Vehicle Identification Number recorded in the software platform tracking the NEMT Trips. Verification of the vehicle may be captured in the following methods:

- Reported through dispatch software
- Equipment connected through the OBDE Port of the vehicle

Examples of evidence to meet compliance
All vehicles in the fleet are recorded in the dispatch software and used consistently to report NEMT Trips.

1006.5 Driver Identification Verification

To ensure compliance with driver reporting requirements, all NEMT Drivers are recorded using the dispatch software through a driver unique identifier which can be assigned to an NEMT Trip.

Examples of evidence to meet compliance:
The organization consistently uses the driver unique identifier to record the NEMT Driver assigned to trips and track the credentials and qualifications.

1006.6 Passenger Verification Signatures

The identified options for passenger verification follow an escalating scale from good to better and finally to the best practices within the Non-Emergency Medical Transportation (NEMT) industry.

- Starting with the good option, utilizing GPS coordinates alone provides a reliable means of confirming trip completion.
- Moving to the better option, recording the passenger's Unique Identifier in the NEMT dispatch platform with the GPS coordinates adds an extra layer of verification.
- Finally, the best option involves a comprehensive approach, combining both GPS coordinates and a verification of the physical presence of the passenger through any of the following means (Identification, cameras, passenger mobile application, etc.)

This escalating scale ensures a progression towards more advanced and secure methods of passenger verification.

Examples of evidence to meet compliance:
The organization designates a form of passenger verification by policy. The designated verification is consistently used while dispatching and auditing NEMT Trips.

1006.7 GPS Coordinates in addition to time

The minimum acceptable information to verify the completion of a NEMT Trip from one location to another includes both the recorded time and the corresponding GPS coordinates. The DateTimeStamp offers a chronological reference, while the GPS coordinates precisely pinpoint the locations involved, forming a verification system that aligns with the industry's standards for trip validation. The DateTimeStamp identifies the vehicle at the specific locations designated by the NEMT Trip.

Examples of evidence to meet compliance:
The organization consistently uses and verifies the GPS Data and the DateTimeStamp to record NEMT Trips completed.

1006.8 GPS Coordinates in addition to Unique Identifier

A standard practice for verifying Non-Emergency Medical Transportation (NEMT) trips involves the integration of GPS coordinates and the capture of the passenger's Unique Identifier into a dedicated NEMT dispatch platform. By incorporating both elements, the NEMT industry ensures a secure method for confirming the completion of trips. The GPS coordinates offer real-time location data, while the inclusion of the passenger's Unique Identifier adds an additional layer of verification, enhancing accuracy and reinforcing the integrity of the trip verification process within the NEMT dispatch platform.

Examples of evidence to meet compliance:
The organization consistently uses and verifies GPS Data and the Unique Identifier to record the NEMT Trips completed.

1006.9 GPS Coordinates in addition to verification of passenger presence

As the Non-Emergency Medical Transportation (NEMT) industry advances, the next level standard for passenger transport verification involves a dual approach: GPS coordinates and a verification of the physical presence of the passenger through any of the following means (Cameras, passenger mobile application, or other technology). The use of technology is continuously evolving, and this standard will be periodically updated to incorporate and re-prioritize the technology used to verify passenger presence in the vehicle.

Examples of evidence to meet compliance:
The organization designates a form of passenger presence by policy. The organization consistently uses and verifies GPS Data and the verification of the physical presence of the passenger to record the NEMT Trips completed.

1006.10 Audit and Verification Practices

Auditing and verifying the specified passenger verification practices within the Non-Emergency Medical Transportation (NEMT) industry involves systematic checks and assessments. The NEMT Provider must adopt a policy to audit and verify the practices adopted in this standard.