

Aries Transportation Services

Compliance Plan Training

New York State Medicaid requires that companies that reach certain thresholds for service implement and maintain a Compliance Plan that meets State requirements.

One of the major components of the Compliance Plan is training. Aries employees will receive this training upon hire and annually after that. There are two major components of the training-Fraud Waste and Abuse and Proper Use of Routing Box Mobile App (GPS Reported, Driver Compliance, Driver and client signatures).

Why is a Compliance Plan important?

A Compliance Plan makes sure that companies:

- Who do business with New York State are good stewards of the State's resources.
- Comply with all Federal and State rules, regulations and statutes.
- Who identify an issue document the issue and self report to the Office of the Medicaid Inspector General.

What are the consequences of not having a Compliance Plan?

- Fines of up to \$10,000 per issue
- Recoupment of all Medicaid \$\$ during an identified period
- Potential loss of the Company's Medicaid ID#
- Potential criminal liability

• Fraud Waste and Abuse

- **What is Fraud:** An intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to himself or some other person. It includes any act that constitutes fraud under applicable Federal and State law.
- **What is Waste:** Over-utilization of services, or other practices that result in unnecessary costs. Waste is generally not considered to be caused by criminally negligent actions but rather the misuse of resources.
- **What is Abuse:** Payment for items or services when there is no legal entitlement to that payment and the individual or entity has not knowingly and/or intentionally misrepresented facts to obtain payment.

Examples of Fraud Waste and Abuse

- Offering anything of value to clients in exchange for their trip.
- Billing for trips that did not occur
- Billing for deceased Member trips
- Conducting trips without regard to the quickest or most efficient route
- Billing for a higher level of service than necessary
- Knowingly transporting for a falsified trip purpose not covered by Medicaid
- Transporting a client by an incorrect mode of transportation i.e. Ambulatory instead of Wheelchair

If you suspect any issues or instances of Fraud Waste or Abuse you have a responsibility to report it to the Aries Compliance Officer, Kevin Carney 716-362-9701 ext. 40, kcarney@ariestransportation.com or anonymously by completing the FWA report sheet located in the rear of the office on the lock box.

Aries Transportation Services encourages employee to report any suspected instances of FWA. Reports are made without fear of retribution or reprisal from the company. Every report is fully investigated by the Compliance Officer, reviewed by the Company President and the Managers.

Trip Status Updates, GPS Tracking, Client and Driver Signatures

Effective April 2023, Aries was required to send electronic 'real time' trip status and GPS data to NYS for all Medicaid transportation. The new Routing Box Software automatically sends GPS coordinates to NYS for as required:

5 trip statuses for each trip:

1. **En Route to Pickup** – Driver marks when they're on the way to the pickup location
2. **Arrived at Pickup** – Driver marks when they've arrived at the pickup location and are waiting for the client. If the client is not present at this stage, update the trip to the **No Show** status.
3. **En Route to DropOff** – Driver marks when client is in the car and they're on the way to the drop-off location.
4. **Arrived at Dropoff** – Driver marks when they have arrived at the drop-off location and the vehicle has stopped.
5. **Completed** – Driver then marks trip complete. If required, the driver and/or client may be prompted to sign for the trip.

GPS Data:

- When the driver updates the trip status the GPS "pings" the address and the state is notified that there is a) enough data to be deemed very accurate assuring the vehicle was at the PU or DO address, b) enough data to be fairly accurate, c) not enough data to assure the vehicle was at the PU or DO address, d) no data

Signatures:

When the driver clicks the trip complete, they will be prompted for a client and driver signature:

- If the client is unable to sign the driver can enter PUTS in the signature line or request that the facility sign on behalf of the client.
- The driver is required to sign off that the trip is completed-the signature should be legible

Aries Transportation Services Compliance Plan Training Employee Sign Off

By signing below, I, _____ acknowledge that:

- I have reviewed the Aries Transportation Services Compliance Plan Training with the Compliance Officer or his designee.
- I know who the Aries Compliance Officer is (Kevin Carny) and how to reach him.
- I know how to reach to file a complaint without fear of retribution or reprisal.
- I know how to file an anonymous report.
- I know that there are 5 status updates to all trips and that GPS data is collected at each status.
- I know that both client and driver signatures are required for NYS Medicaid trips.

Employee Signature: _____ Date: _____

Employee Name Printed: _____

Compliance Officer (or designee) Signature: _____ Date: _____

Original-Compliance plan, copy 1 Driver, copy 2 Driver Training File