

February 8, 2019

Scott Cummings  
Chief Executive Officer  
Care1st Health Plan Arizona  
2355 E. Camelback Rd., Suite 300  
Phoenix, AZ 85016

**RE: Notice of Concern – Non-Emergency Transportation**

Dear Mr. Cummings,

The Arizona Health Care Cost Containment System (AHCCCS) learned that Care1st Health Plan Arizona's (Care1st) contracted non-emergency medical transportation (NEMT) broker, Medical Transportation Brokerage of Arizona (MTBA), may be utilizing providers who do not meet the credentialing requirements established for Provider Type (PT) 28, Non-Emergency Transportation Providers. Requirements not being met include, but are not limited to, the completion of CPR and First Aide training for each driver.

Section D, Paragraph 35, Provider Registration/Termination of the ACC Contract provides:

*The Contractor shall ensure that all of its subcontractors register with AHCCCS as an approved service provider (i.e. AHCCCS registered provider) consistent with provider disclosure, screening, and enrollment requirements [42 CFR 438.608(b), 42 CFR 455.100-106, 42 CFR 455.400-470].*

AHCCCS Provider registration requirements for PT 28, Non-Emergency Transportation Providers, require the Owner/Provider to maintain, and provide upon request, a valid Arizona driver's license for each driver and proof of insurance, CPR and First Aid cards, & HIPPA training documents.

AHCCCS is requiring Care1st to take actions regarding this matter to ensure all drivers are credentialed consistent with current requirements established for PT 28. Actions taken by the Contractor to ensure compliance with credentialing requirements must not compromise member access to appropriate NEMT services.

Care1st shall submit a response to this notice including, at a minimum, the following:

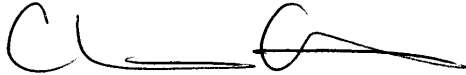
- An analysis of and confirmation of the use of drivers who do not meet the credentialing requirements by MTBA, including the number of drivers and identification of deficiencies.
- An Action Plan to resolve any deficiencies, including a timeline of when the Contractor expects all drivers to come into compliance.

Care1st shall submit this response no later than March 1, 2019 to assigned Operations Compliance Officer Anzio Dickerson.

Failure to demonstrate compliance with requirements outlined in this Notice may result in additional compliance action pursuant to ACC Contract YH19-0001-02 Paragraph 68, Administrative Actions, up to and including sanctions.

Should you have questions regarding this notice, please contact me via email at [Christina.Quast@azahcccs.gov](mailto:Christina.Quast@azahcccs.gov) or via telephone at 602-417-4527.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Quast', with a long horizontal stroke extending to the right.

Christina Quast  
Operations Administrator  
Division of Health Care Management

Cc: Virginia Rountree, AHCCCS  
Michelle Holmes, AHCCCS  
Anzio Dickerson, AHCCCS  
Patty DalSoglio, Care1st