

# Verified Answer to PUC 10-Day Data Request

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**Docket No. A-2025-3057121**

**Familiar Roads Transportation Services**

**880 Town Center Drive, Suite 884A**

**Langhorne, PA 19047**

**Date: October 05, 2025**

**1. To whom will this transportation service be made available? How does Familiar Roads Transportation Services advertise to or acquire passengers for this transportation service?**

Familiar Roads Transportation Services provides Non-Emergency Medical Transportation (NEMT) to the following eligible populations:

- **Participants enrolled in Pennsylvania’s Medicaid Waiver Programs**, including the Community HealthChoices (CHC) program under the Office of Long-Term Living (OLTL)
- **Older adults and senior citizens** who are unable to drive due to age-related or medical limitations
- **Individuals with physical or intellectual disabilities**
- **Current homecare clients** of Familiar Roads Home Healthcare Agency
- **Referred members from Managed Care Organizations (MCOs)** such as UPMC Community HealthChoices, Keystone First CHC, and PA Health & Wellness

Familiar Roads primarily acquires passengers through:

- **Internal referrals** from our own home healthcare division
- **Service coordinators** and care managers under the DHS waiver system
- **Provider directories** and Medicaid-authorized enrollment portals

- **Public-facing materials** such as our website ([www.familiarroadshealth.com](http://www.familiarroadshealth.com)), social media, and printed educational materials distributed to hospitals, senior centers, and social service agencies

All marketing and outreach materials are reviewed to comply with **PUC advertising guidelines**. We avoid any misleading language such as “emergency,” “ambulance,” or “paramedic,” and clearly identify our company as a **non-emergency medical transportation provider**.

Our core service area includes **Bucks, Philadelphia, Montgomery, Lehigh, Delaware, and surrounding counties** in Southeastern Pennsylvania.

### **Verification Statement**

I, Tanya Ferguson, hereby state that the facts above set forth are true and correct to the best of my knowledge, information, and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Signature: Tanya Ferguson, President & CEO

Name: Tanya Ferguson

Title: Administrator, Familiar Roads Transportation Services

Date: 10/05/2025

**2. Does Familiar Roads have an existing written agreement with any state, local or governmental entity, other than the Department of Human Services?**

As of the date of this filing, **Familiar Roads Transportation Services does not currently hold a fully executed written agreement** with any governmental entity beyond our enrollment with the **Pennsylvania Department of Human Services (DHS)**.

However, we are actively in the **final stages of preparing to enter into transportation contracts** with authorized entities that require **proof of licensure by the Pennsylvania Public Utility Commission (PUC)** as a condition of execution and compliance.

Specifically, our company has initiated provider credentialing processes and communications with:

- **Managed Care Organizations (MCOs)** under the Community HealthChoices (CHC) Waiver Program
- **Transportation brokers and subcontractors** responsible for coordinating non-emergency medical transportation (NEMT) services on behalf of waiver participants

These agreements are contingent upon us obtaining a **valid Certificate of Public Convenience** issued by the PUC, which is why this application is both time-sensitive and foundational to our compliance obligations.

We are not seeking PUC approval for speculative purposes; rather, we are securing the license in **anticipation of required compliance for pending governmental contracts**, including waiver-based transportation services under DHS and MCO oversight.

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### 3. How does Familiar Roads determine the rates to be charged to passengers using its transportation services?

#### a. Are any of these rates set by a state, county, local or governmental entity?

Familiar Roads Transportation Services determines its rates based on the **source of the transportation referral or payer**. Our rate methodology falls into two categories:

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#### A. Medicaid Waiver / Government-Funded Clients:

For individuals enrolled in the **Community HealthChoices (CHC)** Waiver Program under the Pennsylvania **Department of Human Services (DHS)**, our rates are strictly regulated.

We accept the **fee schedule and reimbursement rates established by DHS's Office of Long-Term Living (OLTL)** and the participating **Managed Care Organizations (MCOs)** — such as UPMC CHC, Keystone First CHC, and PA Health & Wellness. These rates cover approved non-emergency medical trips as part of the participant's care plan.

We **do not set or modify** these rates independently. They are **publicly available** on the DHS OLTL website and incorporated by reference into our waiver enrollment and MCO participation agreements.

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#### B. Private Pay Clients (Non-Waiver / Out-of-Pocket):

Familiar Roads **does intend to offer transportation to private pay clients** in addition to Medicaid waiver participants. This includes seniors, disabled adults, or other individuals not enrolled in the Medicaid waiver but who require non-emergency transportation to appointments, pharmacies, or errands.

For these clients, Familiar Roads is permitted to **establish private market rates**, which may be based on:

- Per-mile pricing
- Flat rates per zone or county
- Round-trip or wait-time fees

These rates will be clearly disclosed to the private client in writing and are not subject to state control unless connected to a regulated program.

Our private pay services will **remain separate** from Medicaid billing and will comply with all **PUC regulations** applicable to common carriers of persons in paratransit service.

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**a. Are any of these rates set by a state, county, local or governmental entity?**

Yes. Rates for **waiver-funded clients** are set by:

- **Pennsylvania Department of Human Services (DHS)**
- **Office of Long-Term Living (OLTL)**
- **Managed Care Organizations (MCOs)** that operate within the CHC system

We follow their published rate schedules and authorization policies. We will provide documentation of the OLTL Fee Schedule and MCO guidelines upon request.

Rates for **private pay clients** are not set by government entities and are subject to our internal fee structure and PUC tariff rules (if applicable).

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**4. Does any state, county, local or governmental entity regulate or control whether a participant is eligible as a passenger with Familiar Roads' transportation service?**

**a. If yes, what percentage of your overall transportation services are provided to these types of passengers?**

Yes. Familiar Roads Transportation Services operates primarily under the **Pennsylvania Department of Human Services (DHS)** through its **Medicaid Waiver programs**, specifically the **Office of Long-Term Living (OLTL)** and the **Community HealthChoices (CHC)** system.

Eligibility for transportation services is determined and authorized by:

- **Service Coordinators** assigned to each waiver participant through DHS or Managed Care Organizations (MCOs)
- **CHC MCOs**, such as UPMC Community HealthChoices, Keystone First CHC, and PA Health & Wellness
- The participant's enrollment in a DHS-approved Medicaid waiver program with documented need for Non-Emergency Medical Transportation (NEMT) as a covered service

Familiar Roads is required to **verify that all passengers receiving waiver-funded transportation meet the eligibility criteria established by DHS or their MCO**. These determinations are based on clinical needs assessments, support plans, and service authorizations.

We do not unilaterally determine eligibility for these passengers. Our role is to fulfill the transportation once authorized by the appropriate governmental or contractually delegated body.

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**4a.) If yes, what percentage of your overall transportation services are provided to these types of passengers?**

As of this filing, approximately **90% to 95%** of all transportation services provided by Familiar Roads Transportation Services are for **waiver-eligible participants** whose eligibility and service authorizations are regulated by:

- The **Pennsylvania Department of Human Services (DHS)**
- **MCOs** under the Community HealthChoices program

- Local county-level administrative agencies (where delegated)

We anticipate that this percentage will remain high as the company expands its transportation services across Southeastern Pennsylvania counties and continues to serve Medicaid waiver recipients as our primary client base.

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**5. Is Familiar Roads subject to audits or inspections or required to submit reports to any state, county, local or governmental entity? If so, to whom and for what purpose?**

Yes. **Familiar Roads Transportation Services is subject to multiple audits, compliance reviews, inspections, and reporting obligations** by various state and managed care entities. These activities are required to ensure regulatory compliance, participant safety, proper billing, and adherence to credentialing standards.

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**Agencies & Oversight Entities Include:**

**1. Pennsylvania Department of Human Services (DHS)**

Through our enrollment as a Medicaid Waiver provider under the Office of Long-Term Living (OLTL), we are audited for:

- Participant eligibility documentation
- Trip verification logs and driver assignments
- Policy compliance with waiver program standards

**2. Managed Care Organizations (MCOs)**

Including but not limited to UPMC Community HealthChoices, Keystone First CHC, and PA Health & Wellness. These organizations conduct:

- Annual credentialing and recredentialing reviews
- Random audits of trip data for billing integrity
- Service delivery evaluations
- Transportation compliance verification under subcontract agreements

**3. Pennsylvania Public Utility Commission (PUC)**

As a common carrier applicant and (upon issuance) certificate holder, we are subject to:

- Vehicle safety inspections
  - Personnel credential audits (background checks, licensing, insurance)
  - Tariff compliance and operational capacity assessments
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**Types of Reports Submitted Include:**

- **Trip logs and mileage records** (including CareTime/GPS verification)
  - **Driver credential documentation** (CPR, TB, MVR, background checks)
  - **Incident reports** (accidents, client refusals, or injuries)
  - **Quarterly quality assurance data**
  - **Audit responses and corrective action plans**, when applicable
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We maintain internal audit readiness and compliance protocols based on DHS guidelines, OLTL Bulletin requirements, and PUC operational regulations. These include periodic internal file reviews, training verification, and standardized recordkeeping (e.g., pre/post trip checklists, client consent forms, HIPAA logs).

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**6. Is Familiar Roads required by contract with any governmental entity, as a condition of participation, to have a PUC Certificate of Public Convenience?**  
**a. If yes, please identify the governmental entity requiring the certificate and the reason, if known, for the requirement.**

**Yes. Familiar Roads Transportation Services is required by both policy and participation requirements to obtain a Certificate of Public Convenience (PUC Certificate) in order to legally operate as a non-emergency medical transportation (NEMT) provider within the Pennsylvania Medicaid system.**

While this requirement may not be explicitly restated in every individual contract, it is a **core condition of participation** under the oversight of the **Pennsylvania Department of Human Services (DHS)** and the following entities:

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**Identified Governmental Entities Requiring the Certificate:**

**1. Pennsylvania Department of Human Services (DHS)**

- Under the **Office of Long-Term Living (OLTL)** and **Community HealthChoices (CHC)** Waiver, transportation providers must comply with all state licensure and operational requirements.
- A valid PUC Certificate is required to verify that the provider has the legal authority to operate as a **common carrier or paratransit service** within the Commonwealth.

**2. Managed Care Organizations (MCOs)**

- Including **UPMC Community HealthChoices, Keystone First CHC,** and **PA Health & Wellness.**
- These MCOs are responsible for subcontracting transportation providers and typically require **PUC registration and certificate numbers** as part of their credentialing, auditing, and revalidation processes.

**3. Transportation Brokers / Local Authorities**

- Contracts or referrals from transportation brokers (e.g., MTM, Veyo, or county-based authorities) also require providers to maintain **PUC licensure** in good standing.
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**Purpose of the Requirement:**

The **PUC Certificate of Public Convenience** serves to:

- Ensure that the NEMT provider has the legal authority to **transport members of the public for compensation**
- Confirm that the provider complies with Pennsylvania’s regulations related to **vehicle safety, insurance, personnel background checks, and operational capacity**
- Establish that the provider meets the standards required for **billing Medicaid waiver transportation services** in a legally defensible manner

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**Summary:**

Without this certificate, Familiar Roads Transportation Services **cannot fully execute** anticipated transportation contracts or meet the compliance thresholds necessary for DHS/MCO enrollment. This application is submitted in direct response to that operational and contractual necessity.

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**7. Your system for conducting criminal background checks (Title 52 Pa Code §29.505 – Criminal History):**

**I. How often will you conduct criminal background checks?**

**ii. What types of things in their criminal background check would disqualify them from employment?**

**a. Familiar Roads Transportation Services system for conducting criminal background checks (Title 52 Pa Code § 29.505 – Criminal History):**

Familiar Roads Transportation Services follows a multi-layered criminal history screening protocol in full compliance with **Title 52 Pa. Code § 29.505**, the Pennsylvania Department of Human Services (DHS) waiver guidelines, and all applicable PUC safety regulations.

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**i. How often will you conduct criminal background checks?**

We conduct criminal background checks as follows:

- **Prior to hire:** Required for all transportation drivers before any work begins
- **Every 2 years (biennially):** Re-checks for all active drivers and personnel with direct client contact
- **As needed:** Immediate re-screening if triggered by an incident, complaint, audit finding, or driver misconduct report

Each background check file is documented and maintained in the **Driver Qualification File (DQF)** and retained for inspection by the PUC, DHS, or MCOs.

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**Screening Components Include:**

- **PA State Police Criminal History Clearance (PATCH)**
- **FBI Fingerprinting Clearance** (if applicant lived outside PA within the past 2 years)
- **PA Child Abuse Clearance (Act 33/34)**
- **Motor Vehicle Record (MVR) Check**
- **DOT 5-Panel Drug Screening** (Pre-employment + random pool)
- **TB Screening & Physical**

- **Ongoing CPR, First Aid, and Passenger Assistance Safety (PASS) certification**
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**ii. What type of things in their criminal background check would disqualify them from employment?**

Disqualifying offenses include (but are not limited to):

- **Any conviction for abuse or neglect** of a child, elder, or dependent adult
- **Sexual offenses** or presence on any state/national sex offender registry
- **Felony convictions** related to:
  - Assault
  - Domestic violence
  - Robbery or burglary
  - Financial exploitation
- **Driving Under the Influence (DUI)** within the past 5 years
- **Multiple moving violations or reckless driving convictions**
- **Fraud, identity theft, or Medicaid-related billing offenses**
- **Open warrants, current parole/probation violations, or active protection from abuse (PFA) orders**

Familiar Roads Transportation Services reserves the right to **review each record on a case-by-case basis**, however, we adhere to all DHS, OLTL, and PUC disqualification standards.

We also participate in a **Random Drug & Alcohol Testing Consortium** and require immediate removal from duty for any confirmed violations.

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**Reference Documents:**

- Non-Medical Driver Compliance Packet
- NEMT Policy & Procedure Manual (Section: Personnel & Compliance)

- 52 Pa. Code §§ 29.501–509

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