

Elizabeth Richter
Acting Administrator
Centers for Medicare & Medicaid Services

Dear Ms. Richter,

The 60 undersigned advocacy organizations are writing to urge CMS to provide guidance to state Medicaid programs that includes non-emergency medical transportation (NEMT) within the scope of the temporary increase to 100% in federal matching payments for administration of COVID-19 vaccines.

Section 3101 of the American Rescue Plan Act increases the Federal medical assistance percentage (FMAP) to 100 percent for authorized COVID-19 vaccines “and the administration of such vaccine.” As Congress and the administration recognize, there is a critical need for Medicaid beneficiaries to receive the vaccine on a wide scale to achieve herd immunity and mitigate the disproportionate impact of the pandemic on this population. The temporary FMAP increase can significantly help to achieve this shared goal if NEMT services are included in the definition of administration of the vaccine to facilitate access to the vaccine and reduce potential transportation barriers.

Specifically, we ask that CMS issue regulations or guidance confirming that an eligible vaccine administration expense includes expenses for NEMT services furnished to all Medicaid beneficiaries who are eligible for the vaccine and utilize NEMT to and/or from a COVID-19 vaccine appointment.

We also ask that CMS quickly approve states’ requests for any time-limited state plan amendments to respond to the COVID-19 national emergency related to reimbursement and delivery system strategies for ensuring access to NEMT services for COVID-19 vaccine administration. With efficient processes in place, a COVID-19 vaccine can be administered in a relatively short period of time with clinically appropriate monitoring for side effects. Nonetheless, even in the best circumstances, wait times a beneficiary experiences at a site to register or sign in, receive the vaccine, and be monitored for side effects significantly adds time and expense to an NEMT trip and could constrain NEMT networks in many regions and localities, particularly in connection with mass-scale events at stadium or drive-through sites. Accordingly, CMS should encourage states to consider temporarily increasing NEMT reimbursement for vaccine trips (and confirm the 100% FMAP would apply to any such increased reimbursement). Arizona has already taken this step with respect to drive-through vaccine administration and North Carolina temporarily increased reimbursement for NEMT during the public health emergency.

We thank you in advance for giving this request your fullest consideration.

Sincerely,

AIDS Action Baltimore
AIDS Alabama
AIDS Alabama South
AIDS Foundation of Chicago
Allies for Independence
American Academy of HIV Medicine
American Association of People with Disabilities
American Association on Health and Disability
American Federation of County and Municipal Employees
American Kidney Fund
American Network of Community Options and Resources
American Public Transportation Association
American Therapeutic Recreation Association
Amida Care
The Arc of the United States
Association of Programs for Rural Independent Living (APRIL)
Autistic Self Advocacy Network
California Dental Association
Center for Autism and Related Disorders
Center for Public Representation
Children's Health Fund
Community Catalyst
Community Transportation Association of America
Dialysis Patient Citizens
Disability Rights Education and Defense Fund
Easterseals
Equality NC
Families USA
First Focus Campaign for Children
Global Alliance for Behavioral Health and Social Justice
Greater WI Agency on Aging Resources, Inc. (GWAAR)
Justice in Aging
HIV Dental Alliance
HIV Medicine Association
Hudson Valley Community Services
Lakeshore Foundation
Los Angeles LGBT Center
Lutheran Services in America
Medicare Rights Center
Mental Health America
Michael J. Fox Foundation for Parkinson's Research
National Adult Day Services Association (NADSA)
National Alliance on Mental Illness

National Association for Children's Behavioral Health
National Association of Area Agencies on Aging (N4A)
National Association of Directors of Developmental Disabilities Services
National Association of Nutrition and Aging Services Programs (NANASP)
National Council on Aging
National Healthcare for the Homeless Council
Nevada Disability Coalition
Pennsylvania Council on Independent Living
Planned Parenthood of California
Schizophrenia and Related Disorders Alliance of America
SKIL Resource Center
The Transportation Alliance
Treatment Action Group
Treatment Communities of America
United Spinal Association
WI Association of Mobility Managers (WAMM)
Wisconsin Aging Advocacy Network (WAAN)

cc:

Anne Marie Costello
Acting Deputy Administrator & Director
Center for Medicaid and CHIP Services
Centers for Medicare & Medicaid Services

Christen Linke Young, Deputy Director
White House Domestic Policy Council for Health and Veterans Affairs

Marvin Figueroa, Director
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Kimberly Espinosa, Deputy Assistant Secretary for Legislation
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