

COMMUNITY TRANSPORTATION ASSOCIATION OF AMERICA

October 1, 2014

Julie Lovelady
Interim Medicaid Director
Iowa Department of Human Services
100 Army Post Road
Des Moines, IA 50315

Re: Iowa Health and Wellness Plan: NEMT Waiver Amendment

Dear Director Lovelady:

The Community Transportation Association appreciates the opportunity to comment on the proposed NEMT waiver for the Iowa Health and Wellness Plan. Our organization has been involved with assisting communities in providing medical transportation for over thirty years and we are especially concerned about implementation of the non-emergency medical transportation (NEMT) for Medicaid patients. We have written extensively about the rising importance of NEMT as our health care system seek to use outpatient treatments for continuing care and reducing inpatient costs.

Although we support Iowa's bipartisan decision to accept federal Medicaid funding to extend coverage to low-income parents, children and other adults we have substantial concerns regarding your decision to seek an 18-month extension of your existing waiver for NEMT. We believe that the survey data provided with your request shows that the lack of NEMT is a continuing barrier for accessing care and treatment for a significant portion of Medicaid patients.

The Survey data from the University of Iowa Public Policy Center (PPC) found:

- In the past six months, 59% of Iowa Wellness Plan (WP) Members and 43% of Marketplace Choice Members (MPC) needed assistance from other sources to get to their healthcare visit.
- In the past six months, 20% of WP Members and 10% of MPC Members could not get to or from a health care visit because they did not have access to needed transportation.
- In the past six months, 50% of WP Members and 38% of MPC Members worried about their ability to pay for the cost of transportation to or from a health care visit.

In your request, you submit that a "majority of members do not feel lack of NEMT services is prohibiting access to their provider" but, since NEMT is not a benefit that serves the majority of members, nor was it ever intended to, this is a poor standard to evaluate whether NEMT is a necessary service. In 2001, our study¹ estimated that ten percent of the Medicaid population relied primarily on Medicaid to pay for transportation services to get to medical services.

¹ David Raphael, *Medicaid Transportation: Assuring Access to Health Care-A Primer for States, Health Plans, Providers and Advocates*, prepared by the Community Transportation Association of America, January 2001

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The survey data from University of Iowa PPC indicates that, even when excluding the medically frail, at least 10% of beneficiaries in the demonstration are prohibited from accessing care because of a lack of transportation. This demonstrates that the waiver patients are just as likely as regular Medicaid patients to need NEMT.

While the number of beneficiaries who utilize NEMT may be limited, the benefit is a key component of a plan of care for many patients whose lives depend on frequent medical services such as kidney dialysis and cancer care². NEMT has benefits for state budgets as well. A study conducted by Florida State University concluded that if only 1% of medical trips funded resulted in avoidance of an ER hospital visit the payback to the state would be tenfold³.

We respectfully request that you change your position and allow Medicaid patients access to the full range of services NEMT can provide. We believe, based on our information that this will improve the quality of medical services and lessen inpatient services and emergency transportation needs.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Dale J. Marsico", with a stylized flourish at the end.

Dale J. Marsico, CCTM
Executive Director

² Community Transportation Association of America, *Medicaid Expansion and Premium Assistance: The Importance of NEMT to Coordinate Care for Chronically Ill Patients*. February 2014

³ Florida Transportation Disadvantaged Programs Return On Investment Study Prepared By The Marketing Institute / Florida State University's College of Business – Dr. J. Joseph Cronin, Jr., March 2008