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October 26, 2017

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Department of Health and Human Services  
Office of the Assistant Secretary for Planning and Evaluation,  
Strategic Planning Team  
Attn: Strategic Plan Comments  
200 Independence Avenue SW, Room 415F  
Washington, DC 20201

**RE: HHS– 2017–20163**

Dear Strategic Planning Team:

On behalf of the more than 1,500 member organizations of the American Public Transportation Association (APTA), I write to provide comments on the Health and Human Services Strategic Plan, published on September 27, 2017 at 82 FR 45032.

**About APTA**

APTA is a non-profit international trade association of more than 1,500 public and private member organizations, including public transit systems; high-speed intercity passenger rail agencies; planning, design, construction and finance firms; product and service providers; academic institutions; and state associations and departments of transportation.

**General Comments**

APTA has surveyed its member organizations seeking comments in response to the proposed strategic plan. In general, APTA members welcome the opportunity to emphasize the important role public transportation plays in U.S. Department of Health and Human Services (HHS) meeting the goals laid out in the draft HHS Strategic Plan for Fiscal Year (FY) 2018-2022, especially improving access to and affordability of health care for all Americans. Many of our members across the country work hard every day to provide transportation for the elderly and people with disabilities, and ensure subway and bus services are accessible to persons with disabilities, in compliance with the American's with Disabilities Act (ADA). In addition, transit agencies provide

paratransit service as a “safety net” for those persons with disabilities unable to use accessible fixed route services. Over the years, paratransit programs nationwide have grown beyond the original intent of the ADA. Human service agencies often lack their own funding or federal support to provide transportation to their program and services. Today, paratransit service programs have become the primary system for providing transportation to human service agencies and their programs.

However, there are still many Americans who cannot adequately or affordably access available human services due to insufficient local transportation options. The Federal Transit Administration (FTA) states on its website, “Lack of transportation access can create a barrier for treatment and screening, with an estimated 3.6 million Americans missing or delaying non-emergency medical care each year because of transportation issues. Many people may not make appointments or take advantage of free health screenings due to not being able to get a ride.”

With that context, APTA submits the following comments:

*APTA recommends the Strategic Plan better reflect the importance of transportation to improved health outcomes and meeting HHS’s stated goals. Transportation should be highlighted as part of many of the objectives and strategies, including but not limited to:*

- Objective 1.1 “Promote affordable health care, while balancing spending on premiums, deductibles, and out-of-pocket costs” and specifically “promote preventive care to reduce future medical costs.” Out of pocket expenses, including for transportation, can add up and discourage patients from seeking preventive care that reduces long term medical costs.
- Objective 1.3 “Improve Americans’ access to health care and expand choices of care and service options” and specifically strategies to “reduce disparities in access to health care,” which include removing barriers to inclusion and accessibility for people with disabilities in public health programs and identifying individuals and populations at risk for limited health care access and assist them to access health services.
- Objective 3.1 “Encourage self-sufficiency and personal responsibility, and eliminate barriers to economic opportunity.” Mobility and public transportation services are key to many disadvantaged populations gaining self-sufficiency as well as accessing and sustaining employment opportunities.
- Objective 3.4 “Maximize the independence, well-being, and health of older adults, people with disabilities, and their families and caregivers.” Non-emergency medical transport is a service critical to the health and independence of older adults and those with disabilities. It also relieves pressure on family members who might otherwise be forced to miss work to take their relative to health care appointments.
- Objective 5.1 “Ensure responsible financial management.” HHS oversees funding and programs that provide transportation. In order to make sure resources are efficiently managed, it is important that HHS coordinate both internally and externally with other federal, state and local agencies that provide transportation services.

*APTA requests the Strategic Plan identify HHS health care programs and funding that help Americans overcome transportation barriers to affordable, quality health care. HHS should include specific actions that ensure programs and policies support transportation services that connect Americans with necessary human services, such as health care and dialysis as well as access to employment and daycare for those with intellectual and developmental disabilities.*

*APTA also urges HHS to include a strong commitment to the coordination and alignment of HHS and U.S. Department of Transportation (DOT) policies and programs that help meet health care transportation needs. HHS sits on the Coordinating Council on Access and Mobility (CCAM), a federal interagency council housed in DOT. Per CCAM's website, "Agencies across the government administer 80 programs to fund transportation services for people with disabilities, older adults, and lower-income individuals. However, those transportation services can be costly and fragmented due to inconsistent program rules and a lack of interagency collaboration." Although CCAM resides in DOT, HHS is a critical partner in solving this problem and improving the coordination of limited HHS and other government-provided transportation resources. Improved coordination is essential to ensuring that federal tax dollars are being utilized in the most efficient manner. It is also worth noting CCAM's website lists submitting public comments on the HHS FY18-22 Strategic Plan as a way for the public to "Get Involved".*

Thank you for the opportunity to submit these comments. APTA looks forward to HHS' continued engagement in coordinating services among CCAM member agencies and providing transportation services as a way to reduce barriers to health care access and meet HHS strategic goals. For additional information, please contact Linda Ford, APTA's General Counsel, at (202) 496-4808 or [lford@apta.com](mailto:lford@apta.com).

Sincerely yours,

A handwritten signature in black ink, appearing to read "Richard A. White". The signature is fluid and cursive, with the first name being the most prominent.

Richard A. White  
Acting President & CEO

RAW:lcf