



November 16, 2018

Brenda Destro
Deputy Assistant Secretary for Planning and Evaluation
U.S. Department of Health and Human Services
200 Independence Ave. SW
Washington DC, 20201

Submitted electronically through ASPEImpactStudy@hhs.gov

Attention: RFI Provider and Health Plan Approaches To Improve Care For Medicare Beneficiaries With Social Risk Factors.

Dear Deputy Assistant Secretary Destro:

Medicare Advantage (MA) plans are taking advantage of new flexibilities and changes in the uniformity requirements granted by the Centers for Medicare and Medicaid Services (CMS) to offer supplemental benefits if they compensate for physical impairments, diminish the impact of injuries or health conditions, and/or reduce avoidable emergency room utilization.

An increasing number of plans, are offering non-emergency medical transportation (NEMT) as a supplemental benefit. Avalere compared¹ benefits data in CMS's 2019 and 2018 plan benefit package (PBP) files and found a 22% increase in the number MA plans offering transportation benefits in 2019. This increase means that one in four MA plans will be offering transportation to some or all of their beneficiaries.

On the other hand, the NEMT benefit is a key element of a coordinated care plan for all Medicaid beneficiaries. An analysis² of data from the largest manager or "broker" of

¹ Creighton, Sean; Young, Joanna. "Medicare Advantage Beneficiaries Will See a Jump in New Supplemental Benefit Offerings in 2019." Oct 19, 2018. <http://avalere.com/expertise/managed-care/insights/medicare-advantage-beneficiaries-will-see-a-jump-in-new-supplemental-benefi>

² Kaiser Commission on Medicaid and the Uninsured. Medicaid Non-Emergency Medical Transportation: Overview and Key Issues in Medicaid Expansion Waivers. February 24, 2016.

Medicaid NEMT, LogistiCare Solutions, showed that the majority of NEMT services are for individuals requiring additional assistance with regularly scheduled transportation to coordinated care for behavioral health services, substance abuse treatment and dialysis services. LogistiCare Solutions also manages transportation for a number of Medicare Advantage (MA) plans.

The ASPE RFI asks for information on the Return on Investment (ROI) for providing services to improve care for Medicare beneficiaries with social risk factors. While not focusing on MA plans, a recent study on behalf of the Medical Transportation Access Coalition³ (MTAC) uses Medicaid claims data and a survey of nearly 1,000 Medicaid beneficiaries to determine the ROI in NEMT for three common conditions and their corresponding treatments. As summarized by the study authors⁴:

- Dialysis for kidney disease:
 - Survey respondents reported attending an average of 12.0 dialysis treatments a month using non-emergency medical transportation and said they would expect to attend only 4.1 treatments a month without it.
 - The analysis calculated that NEMT saves Medicaid \$3,423 per month for each individual with kidney failure receiving dialysis, or \$41,076 per year.
- Diabetic wound care:
 - Survey respondents reported attending an average of 5.5 wound care treatments a month using NEMT but expected to attend only 1.3 treatments a month without it.
 - The analysis calculated that Medicaid would avoid spending \$792 per member per month, or \$9,504 per year, by keeping patients on a path to receive all necessary wound care treatments.
- Substance use disorder treatment:
 - NEMT did not appear to save Medicaid money for patients with substance use disorder, in part because the survey methods did not identify the full range of costs avoided.
 - It is possible that different study parameters (such as longer claims analysis period, consideration of relapse rates, and quantification of social costs such as increased employment and productivity) would likely lead to a positive ROI.

Many of these chronic conditions occur with similar frequency among the MA population. For example, according to the Medicare Payment and Advisory Commission (MedPAC), half

<https://www.kff.org/medicaid/issue-brief/medicaid-non-emergency-medical-transportation-overview-and-key-issues-in-medicaid-expansion-waivers/>

³LogistiCare Solutions is a founding member of the Medical Transportation Access Coalition; <https://mtaccoalition.org/>

⁴ Adelberg, Michael; Salber, Patricia; and Cohen, Michael. "Curtailing Medicaid's transportation benefit is 'penny-wise and pound-foolish.'" StatNews. July30, 2018.

<https://www.statnews.com/2018/07/30/curtailing-medicaid-transportation-benefit-pennywise-pound-foolish/>

of the end stage renal disease (ESRD) Medicare beneficiaries are dual eligible. Thus, it is highly likely that MA plans will see similar ROIs associated with providing NEMT to beneficiaries with chronic conditions and social risk factors.

Simon&Co appreciates the opportunity to provide ASPE with the MTAC study and its methodology.⁵

Please contact us if you have any questions.

Sincerely,

A rectangular box containing a handwritten signature in cursive script that reads "Marsha Simon".

Marsha Simon, PhD
President
Simon&Co.

Attachments

⁵ "Study Reveals Non-Emergency Medical Transportation (NEMT) is Extremely Cost-Effective and Life-Saving to Medicaid Program." <https://mtacoalition.org/study-reveals-non-emergency-medical-transportation-nemt-is-extremely-cost-effective-and-life-saving-to-medicaid-program/>