

March 15, 2021

Liz Richter
Acting Administrator
Centers for Medicare & Medicaid Services

Dear Ms. Richter,

We are writing as the members of the Medical Transportation Access Coalition (MTAC) (www.MTACCoalition.org) 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.

Founded in 2017 by three leading transportation brokerage companies, MTAC was formed to educate federal and state policymakers and other stakeholders about the benefits of non-emergency medical transportation (NEMT) and the need for policies to support continued access to these services. The coalition's founding and allied members include a diverse set of transportation brokers and providers, managed care organizations and trade associations, and patient advocacy groups. MTAC is the largest multi-stakeholder policy coalition solely focused on protecting and advancing NEMT.

We thank the President and Congress for enacting the American Rescue Plan Act. Section 9811 of the 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.

As part of this guidance, we also recommend that CMS encourage states to consider 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). One state, Arizona, has already taken this step with respect to drive-through vaccine administration.

MTAC appreciates your consideration of these requests. We are happy to answer any questions you may have and eager to be a trusted resource to CMS to successfully implement the American Rescue Plan Act.

Sincerely,
Medical Transportation Access Coalition

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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