

June 13, 2025

The Honorable Mehmet Oz, M.D.
Administrator
Centers for Medicare & Medicaid Services
200 Independence Avenue SW
Washington, DC 20201

Dear Administrator Oz,

We, an informal coalition of patient advocates and stakeholders, oppose the extension of the Iowa Health and Wellness Plan Section 1115 waiver that denies non-emergency medical transportation (NEMT), **a benefit required by statute**, for the Medicaid expansion population.

The state's decision **to waive the NEMT benefit for the expansion population jeopardizes Iowan's access to critical health care services**, especially in rural areas. A 2024 study by the Agency for Healthcare Research and Quality (AHRQ) using the 2021 Medical Expenditure Panel Survey (MEPS) measured the prevalence of lack of reliable transportation.¹ The study found that adults with public health insurance were more likely than those with private insurance to lack reliable transportation, and the highest percentage of adults who lacked reliable transportation was in Medicaid (20.4%). The study also found that individuals with chronic health conditions were more likely than their counterparts to lack reliable transportation. The number of comorbidities a person experienced was directly related to lack of reliable transportation: 6.6% of adults with at least two conditions lacked reliable transportation while 9.1% of adults with at least four conditions did.

A review of Iowa's process to screen the medically frail out the ACA benchmark plan failed to identify those individuals who continued to qualify for NEMT because of their health conditions. Without adequate protection for these individuals, the waiver cannot be granted because it does not comply with federal requirements to protect these vulnerable Medicaid enrollees. **For this and the other reasons, we urge you to reject this waiver request.**

Thank you for the opportunity to comment. If you have any questions, please have your staff contact Patrick Butler at pbutler@mjsimonandcompany.com or (202) 204-4707.

Sincerely,

The Coalition for NEMT Access
ADVOCAP
AIDS Action Baltimore
AIDS Alabama
AIDS Foundation of Chicago
American Academy of HIV Medicine
American Association of People with Disabilities
American Association on Health and Disability

American Federation of State, County and Municipal Employees
American Kidney Fund
American Public Transportation Association
Amida Care
ANCOR
Autistic Self Advocacy Network
California Dental Association
Center for Autism and Related Disorders
Center for Public Representation
Children's Health Fund
Coordinated Transportation Solutions
Cornerstone Family Healthcare
Dialysis Patient Citizens
Disability Rights Education and Defense Fund
Easterseals
Epilepsy Foundation
Equality NC
Families USA
First Focus
Global Alliance for Behavioral Health and Social Justice
HIV Medicine Association
Hudson Valley Community Services
Iowa Public Transit Association
Justice in Aging
Lutheran Social Services of Wisconsin and Upper Michigan
Medicare Rights Center
Mental Health America
Mind Spring
National Adult Day Services Association (NADSA)
National Alliance on Mental Illness
National Association for Children's Behavioral Health
National Association of Nutrition and Aging Services Programs (NANASP)
National Council on Aging
National Health Care for the Homeless Council
National Rural Health Association
Pennsylvania Council on Independent Living
Planned Parenthood Affiliates of California
SKIL Resource Center
The Arc of the United States
The Consumer Voice

The National Association of State Directors of Developmental Disabilities Services (NASDDDS)
The Transportation Alliance
Treatment Action Group
Treatment Communities of America
United Spinal Association
USAging

ⁱ Wu X, Decker SL. Lack of Reliable Transportation for Daily Living Among Adults: United States, 2021. Statistical Brief #558. AHRQ Publication No. 25-0017-1-EF. Rockville, MD: Agency for Healthcare Research and Quality; November 2024. https://meps.ahrq.gov/data_files/publications/st558/stat558.shtml