6/8/20

The Honorable Seema Verma

Administrator

Centers for Medicaid and Medicare Services

Department of Health and Human Services

200 Independence Avenue, N.W.

Washington, D.C. 20201

Dear Administrator Verma,

The undersigned organizations appreciate the opportunity to comment on Oklahoma’s proposed amendment to its 1115 Demonstration Waiver, SoonerCare 2.0.

Oklahoma’s waiver amendment would waive non-emergency medical transportation for expansion adults. Elimination of the NEMT benefit for these individuals would be detrimental to their health and well-being and does not promote the objectives of the Medicaid program.

The Medicaid NEMT benefit is disproportionately used by patients in need of critically important, frequent services—patients needing treatment for cancer, mental health conditions, HIV, or end-stage renal disease (ESRD) account for more than half of Medicaid transportation utilization. The coronavirus pandemic has made these NEMT even more crucial for beneficiaries at high risk of severe complications from COVID-19—namely those with ESRD—as public transit has become dangerous for these beneficiaries. During the pandemic, Medicaid NEMT also transports beneficiaries to COVID-19 testing services.

The Oklahoma Health Care Authority (OHCA) has previously found that many SoonerCare beneficiaries lacks adequate transportation. In 2018, OCHA surveyed 400 members, 16% of whom either did not have a car or could not get a ride from a friend or family member. As of January 2020, the total SoonerCare population was 781,770. Taken with the 2018 survey data, this indicates that roughly 125,000 beneficiaries lack adequate transportation. Before the state proposes to eliminate a benefit that the state has previously identified as a barrier to access based on data the is unrepresentative of the population that relies most on the benefit.

Section 1115 of the Social Security Act gives the Secretary of Health and Human Services authority to approve demonstration projects that promote the objectives of the Medicaid program. Oklahoma’s request to eliminate NEMT would increase costs, harm patients, and not promote the objectives of the Medicaid program.

The undersigned organizations ask that you reject the proposed SoonerCare 2.0 waiver’s provision to remove NEMT.

Regards,

AIDS Action Baltimore

AIDS Alabama

AIDS Alabama South

AIDS Foundation of Chicago

Allies for Independence

American Academy of HIV Medicine

American Association of People with Disabilities

American Association on Health and Disability

American Federation of County and Municipal Employees

American Kidney Fund

American Network of Community Options and Resources

American Public Transportation Association

American Therapeutic Recreation Association

Amida Care

The Arc of the United States

Association of Programs for Rural Independent Living (APRIL)

Autistic Self Advocacy Network

Center for Autism and Related Disorders

Center for Public Representation

Children's Health Fund

Community Catalyst

Community Transportation Association of America

Dialysis Patient Citizens

Disability Rights Education and Defense Fund

Easterseals

Epilepsy Foundation

Equality NC

FamiliesUSA

First Focus Campaign for Children

Global Alliance for Behavioral Health and Social Justice

Greater WI Agency on Aging Resources, Inc. (GWAAR)

Justice in Aging

HIV Dental Alliance

HIV Medicine Association

Hudson Valley Community Services

Lakeshore Foundation

Los Angelos LGBT Center

Lutheran Services in America

Medicare Rights Center

Mental Health America

Michael J. Fox Foundation for Parkinson's Research

National Adult Day Services Association (NADSA)

National Alliance on Mental Illness

National Association for Children's Behavioral Health

National Association of Area Agencies on Aging (N4A)

National Association of Directors of Developmental Disabilities Services

National Association of Nutrition and Aging Services Programs (NANASP)

National Council on Aging

National Healthcare for the Homeless Council

Nevada Disability Coalition

Pennsylvania Council on Independent Living

Schizophrenia And Related Disorders Alliance of America

SKIL Resource Center

The Transportation Alliance

Treatment Action Group

Treatment Communities of America

United Spinal Association

WI Association of Mobility Managers (WAMM)

Wisconsin Aging Advocacy Network (WAAN)