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Ms. Vikki Wachino  
Director  
Centers for Medicaid and CHIP Services  
Centers for Medicare and Medicaid Services  
7500 Security Boulevard  
Baltimore, Maryland 21244

Re: Iowa Health and Wellness Plan: NEMT Waiver Amendment

Dear Ms. Wachino:

Simon&Co., a health policy firm, opposes extension of the non-emergency medical transportation (NEMT) waiver in Iowa because evidence supports the need for this long-standing, mandatory benefit for the state's Medicaid expansion population.

According to the state's own data, since Iowa expanded Medicaid under a section 1115 waiver, over 15,000– or roughly 13% – of enrollees in Iowa's Health and Wellness Program have experienced an unmet need for transportation to health care visits. This is consistent with NEMT historical usage of 10% in the Medicaid population nationwide<sup>1</sup>. Furthermore, data acquired by Simon&Co. from the nation's largest NEMT broker shows that utilization (one way trips/members) of NEMT by Medicaid expansion beneficiaries in two other states is comparable to analogous, pre-expansion beneficiaries.

The data acquired by Simon&Co. are statewide analyses of NEMT utilization comparing the number of trips and health services accessed by pre-expansion Medicaid beneficiaries (excluding\* the aged, blind or disabled) with Medicaid expansion beneficiaries. State One expanded Medicaid under a Republican governor and is largely urban while State Two expanded Medicaid under a Democratic governor and is largely rural.

The data shows that, during the past 8 months, utilization by expansion beneficiaries in State One and State Two grew fifty-four and eighty-nine percent respectively (see tables below). This growth in utilization cannot be attributed to seasonal effects as growth in the pre-expansion group was significantly lower. While current utilization among expansion beneficiaries remains about a quarter of the pre-expansion beneficiaries, it is expected that this rapid growth will continue as new beneficiaries become aware of their transportation benefits and utilization between the two groups will equalize.

<b>State One</b>	<b>Members</b>	<b>Trips</b>	<b>Utilization (Trips / Members)</b>	<b>Growth in Utilization Over Past 8 Months</b>
<b>Expansion Population</b>	211,164	10,160	4.8%	54.3%
<b>TANF Eligible Medicaid Population</b>	1,150,986	232,010	20.1%	13%

<sup>1</sup> Rafael D. Medicaid Transportation: Assuring Access to Health Care. A Primer for States, Health Plans, Providers and Advocates. Washington, DC: Community Transportation Association of America (CTAA); 2001.

\* Aged, blind and disabled populations are excluded to roughly control for health status in comparison groups

State Two	Members	Trips	Utilization (Trips / Members)	Growth in Utilization Over Past 8 Months
Expansion Population	372,560	14,837	4.0%	89.1%
TANF Eligible Medicaid Population	99,288	18,999	19.3%	21%

Lack of awareness of NEMT benefits is common in all states even among populations that have had the benefit for years. Iowa's Olmstead Consumer Task Force recently pointed out "...when brokerage began operations [in Iowa] in 2010, advocates for transit dependent populations were shocked and angered to learn that information...was to be communicated in direct mail only...despite numerous comments in 2008 that many people were confused about their right to access NEMT."

In addition, data acquired by Simon&Co. shows that the beneficiary comparison groups in both State One and State Two use NEMT to access similar medical services as their pre-expansion Medicaid counterparts. The expansion population uses NEMT at a higher rate for preventive care, a key focus of the Affordable Care Act, and at a similar rate for substance abuse and mental health services.

There is strong evidence that thousands of new Medicaid beneficiaries in Iowa would benefit from restoration of NEMT services. Iowa already operates a statewide NEMT program for non-expansion Medicaid beneficiaries and with a marginal cost of about \$2.50 per member per month there is no rationale for approving Iowa's request to drop NEMT benefits. The NEMT benefit has been a state requirement since the program's inception. The first Medicaid handbook, written nearly 50 years ago, stated that NEMT is "necessary to the efficient administration"<sup>2</sup> of the program, for the common sense reason that Medicaid beneficiaries will not be able to obtain necessary and timely medical care without the means of getting to the providers of the service.

We thank you for the opportunity to comment on the NEMT waiver to the Iowa Health and Wellness Plan, if you have any questions please have your staff contact me at [msimon@mjsimonandcompany.com](mailto:msimon@mjsimonandcompany.com) or 202-204-4707.

Sincerely,



Marsha J. Simon  
President  
MJ Simon and Company

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<sup>2</sup> 42 USC § 1396 (d)(5)