

## **Comment on UT 1115 Waiver**

The 59 undersigned advocacy organizations appreciate the opportunity to comment on the Utah Primary Care Network demonstration extension application: specifically, the exclusion of non-emergency medical transportation (NEMT) as a benefit for the adult expansion population. We are disappointed that the state excluded this NEMT benefit in the federal application. Our research and that of others has shown that a state-wide, professionally managed NEMT benefit reduces waste, fraud, and abuse; increases rides at no additional cost to the taxpayer; and promotes quality and beneficiary responsiveness. Overall, the NEMT benefit is used by only 7 percent of the Medicaid population and accounts for less than 1 percent of total Medicaid spending. Thus, the state's argument that omitting the NEMT benefit is necessary because of its cost is baseless.

As the NEMT benefit is used primarily to access recurrent appointments for critical services such as dialysis, medication-assisted substance use disorder treatment and other behavioral health services, it is critical that the benefit be available for all demonstration-eligible populations and that the service be safe, reliable and provided with the most appropriate, lowest cost mode of transportation. The modest cost of transporting a beneficiary to a dialysis session or to a doctor's appointment to help manage multiple chronic conditions has been proven across multiple studies (e.g., Cronin, Jr., et al. 2008; J.M. Stephens et al. 2013) to be far less than the costs incurred if such appointments are missed, and beneficiaries require more drastic and expensive interventions.

In light of the recent codification of NEMT requirements into the Social Security Act as part of the Consolidated Appropriations Act, 2021, and prior regulatory guidance since 1966 requiring the benefit for all Medicaid patients without a means of transportation to medically necessary services, we urge the state of Utah to restore the NEMT benefit to the adult expansion population for the five years of this waiver extension.

Sincerely,

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  
California Dental Association  
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  
Equality NC  
Families USA  
First Focus Campaign for Children  
Global Alliance for Behavioral Health and Social Justice  
Greater WI Agency on Aging Resources, Inc. (GWAAR)  
HIV Dental Alliance  
HIV Medicine Association  
Hudson Valley Community Services  
Lakeshore Foundation  
Los Angeles LGBT Center  
Lutheran Services in America  
Medicare Rights Center  
Mental Health America  
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 Nutrition and Aging Services Programs (NANASP)  
National Council on Aging  
National Healthcare for the Homeless Council  
Nevada Disability Coalition  
Pennsylvania Council on Independent Living  
Planned Parenthood of California  
Schizophrenia and Related Disorders Alliance of America (SARDAA)  
SKIL Resource Center  
The Michael J. Fox Foundation for Parkinson's Research  
The Transportation Alliance  
Treatment Action Group  
Treatment Communities of America  
United Spinal Association  
Wisconsin Aging Advocacy Network (WAAN)

Wisconsin Association of Mobility Managers (WAMM)  
Wyoming Patients Coalition