

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