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October 23, 2014

Cindy Mann, Director  
Center for Medicaid and CHIP Services  
Centers for Medicare and Medicaid  
Department of Health and Human Services

Re: The Proposed Amendment to extend the current waiver of non-emergency medical transportation (NEMT) in the Iowa Marketplace Choice Plan and Wellness Plan Demonstration

*Submitted via email and Medicaid.gov*

Dear Ms. Mann:

AARP is pleased to submit comments on the Iowa Health and Wellness Plan: NEMT Waiver Amendment, which seeks to extend, until June 2016, a waiver of non-emergency medical transportation (NEMT) benefits for certain members of the Iowa Health and Wellness plan. AARP is a nonprofit, nonpartisan organization, with a membership of more than 37 million, that helps people turn their goals and dreams into real possibilities, strengthens communities and fights for the issues that matter most to families such as healthcare, employment and income security, retirement planning, affordable utilities and protection from financial abuse.

We noted the importance of the NEMT benefit in our state and federal-level comment letters submitted during the development of the Iowa Health and Wellness plan, and we continue to support its inclusion. As such, we urge the CMS to deny this request to extend the waiver of this important benefit.

AARP believes that omitting NEMT benefits is especially harmful in a state like Iowa with a significant rural population. As noted in the waiver amendment, survey data from the University of Iowa Public Policy Center (PPC) indicates that in the last six months, 20 percent of Iowa Health and Wellness Plan members with incomes below 100 percent of the FPL and 10 percent of members with incomes between 100-138 percent of FPL needed transportation to or from a health care visit but **could not get it**. This already significant need for NEMT is only likely to grow as the population ages. Under the Iowa Health and Wellness Plan's incentive program, failure to provide NEMT would likely result in more enrollees having to pay monthly contributions simply because they did not have adequate transportation to fully comply with the program.

Recent analysis also illustrates the vital role Medicaid non-emergency transportation plays for low-income individuals in accessing health care services, especially those with chronic illnesses who require recurring medical appointments.<sup>1</sup> AARP believes this lack of coverage is counterproductive to last year's stated goal of the Iowa Health and Wellness Plan "to improve the use of preventive services and other healthy behaviors" because it will likely lead to more missed appointments and failure to complete specified preventive services. The University of Iowa PPC survey is early evidence that lack of NEMT coverage is a barrier to access to care for eligible Iowans, even among those currently enrolled. Additionally, this is a survey of only current members of the Iowa Health and Wellness Plan, which by definition does not include those otherwise eligible low-income Iowans who still lack coverage and continue to face access barriers and challenges.

Finally, not providing NEMT would be contrary to federal guidance. Waiving non-emergency medical transportation would be contrary to CMS' March 2013 guidance, which was clear that even in alternative "premium assistance" Medicaid expansion arrangements, like the demonstration in Iowa, "beneficiaries remain Medicaid beneficiaries and continue to be entitled to all benefits and cost-sharing protections. States must have mechanisms in place to 'wrap-around' private coverage to the extent that benefits are less ... than those in Medicaid."<sup>2</sup>

Thank you for the opportunity to provide comments. If you have any questions, please do not hesitate to contact KJ Hertz on our Government Affairs staff at (202) 434-3732 or [khertz@aarp.org](mailto:khertz@aarp.org).

Sincerely,



David Certner  
Legislative Counsel and Legislative Policy Director  
Government Affairs

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<sup>1</sup> A recent study, "Medicaid Expansion and Premium Assistance: The Importance of Non-Emergency Medical Transportation (NEMT) To Coordinated Care for Chronically Ill Patients," (MJS & Company, March 2014) published by the *Journal of Health Economics* found that the "premium requirement itself, more so than the specific dollar amount, discourages enrollment." <http://web1.ctaa.org/webmodules/webarticles/articlefiles/NEMTreportfinal.pdf>.

<sup>2</sup> Centers for Medicare & Medicaid Services. "Medicaid and the Affordable Care Act: Premium Assistance." March 2013.