



American Cancer Society
Cancer Action Network
555 11th Street, NW
Suite 300
Washington, DC 20004
202.661.5700
www.acscan.org

July 19, 2016

The Honorable Sylvia Mathews Burwell, Secretary
Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Avenue, SW
Washington, D.C. 20201

Re: Iowa Health and Wellness Plan: NEMT Waiver Amendment

Dear Secretary Burwell:

The American Cancer Society Cancer Action Network (ACS CAN) urges the Centers for Medicare and Medicaid Services (CMS) to deny Iowa's application to extend its waiver of non-emergency medical transportation (NEMT) benefit through December 31, 2019. ACS CAN, the nonprofit, nonpartisan advocacy affiliate of the American Cancer Society, supports evidence-based policy and legislative solutions designed to eliminate cancer as a major health problem. As the nation's leading advocate for public policies that are helping to defeat cancer, ACS CAN ensures that cancer patients, survivors, and their families have a voice in public policy matters at all levels of government.

ACS CAN opposes Iowa's request to continue waiving NEMT service for IHAWP enrollees who are not medically exempt. Over 17,000 Iowans – many of whom will rely on Medicaid for affordable health care coverage – are expected to be diagnosed with cancer this year.¹ We are concerned the continued use of the NEMT waiver will continue to create barriers for cancer screenings, diagnostic, and treatment services for low-income Iowans.

The state of Iowa provided data from two University of Iowa Public Policy Center surveys detailing enrollee experience with transportation and access to health care services. Both surveys demonstrate that enrollees in both the Marketplace Choice and Wellness Plans (or the expansion population) are experiencing challenges accessing transportation to or from a health care visit, compared to enrollees in the traditional Medicaid program.² The Public Policy Center survey revealed that approximately one-third (31 percent) of enrollees in the Marketplace Choice and Wellness Plans reported "usually or always needing transportation assistance from other sources" (e.g., family members, friends, public transportation, etc.) to get to a health care visit, which was significantly higher than what was reported

¹ American Cancer Society. Cancer Facts & Figures: 2016. Atlanta: American Cancer Society, 2016.

² Bentler S, Damiano P, Momany E, McInroy B, Heeren T. Non-emergency medical transportation and the Iowa Health and Wellness Plan. *University of Iowa's Public Policy Center*. Published March 2016. Accessed July 2016. <https://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Waivers/1115/downloads/ia/Wellness-Plan/ia-wellness-plan-nemt-rpt-mar-2016.pdf>.

by traditional Medicaid enrollees with the NEMT benefit (18 percent).³ Thus, for individuals in the expanded population, lack of transportation equates to lack of access to their health care services and providers – a particular problem for cancer patients in active treatment.

Non-Emergency Medical Transportation

NEMT is a critical service for many low-income Medicaid beneficiaries who do not have the financial means or the access to needed transportation services.⁴ Without transportation benefits, chronically ill Medicaid beneficiaries, such as those with cancer, may go without the life-saving health services they need, leading to delayed care, an increase in avoidable hospitalizations, and poorer health outcomes.⁵

According to data collected by the Community Transportation Association of America report in 2013, over half of all NEMT trips in the United States were provided to people with complex medical conditions and needs, such as cancer, kidney disease, and behavioral health disorders.⁶ After receiving a cancer diagnosis, one of the most difficult challenges patients face is getting to and from treatment. Oncology practitioners often counsel cancer patients not to drive following treatment, as patients are often fatigued or drowsy and unable to drive or use public transportation. Patients often do not have a family member or friend who is available to provide regular assistance with transportation over the course of their treatment. Individuals with cancer need regular access to care and cancer treatment services, and when that access is disrupted – as it could be when an individual lacks access to transportation services – the effectiveness of the treatment could be jeopardized and the individual's chance of survival can be significantly reduced.

In addition, NEMT is used by individuals to access preventive services and cancer screenings – especially colon cancer screenings and mammograms. Early detection of cancer through preventive services results in less expensive treatments and better health outcomes. In addition, some cancer screenings can prevent cancers from developing (such as colonoscopies and Pap tests) by detecting and removing pre-cancerous polyps or lesions. However, lack of transportation to screening services hinders an individual's ability to obtain the necessary screening and for some individuals could result in detection of cancers at a later stage. ACS CAN strongly urges the Department to revoke Iowa's request for an extension to their NEMT waiver, which seriously disadvantages low-income Iowans with cancer who are in need of the benefit and those enrollees who could face a cancer diagnosis in the future.

³ Ibid.

⁴ Rosenbaum S, Lopez N, Morris MJ, Simon M. Medicaid's medical transportation assurance: Origins, evolution, current trends, and implications for health reform. Washington, D.C.: Department of Health Policy, School of Public Health and Health Services, The George Washington University, 2009.

⁵ Kim J, Norton EC, Stearns SC. Transportation Brokerage Services and Medicaid Beneficiaries' Access to Care. *Health Serv Res.* 2009. 44(1):145-61. doi: 10.1111/j.1475-6773.2008.00907.x

⁶ MJS & Company. *Medicaid Expansion and Premium Assistance: The Importance of Non-Emergency Medicaid Transportation (NEMT) To Coordinated Care for Chronically Ill Patients.* Published March 2014. Accessed June 2016. <http://web1.ctaa.org/webmodules/webarticles/articlefiles/NEMTreportfinal.pdf>.

Conclusion

We appreciate the opportunity to comment on the NEMT waiver to the Iowa Health and Wellness Plan. Maintaining access to quality, affordable, accessible, and comprehensive health care coverage and services is a matter of life and survivorship for thousands of low-income cancer patients, and we look forward to working with the Department to ensure that all Americans are positioned to win the fight against cancer. If you have any questions, please feel free to contact me or have your staff contact Michelle DeFavero of our policy team at Michelle.DeFavero@cancer.org or 202-585-3266.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kirsten Sloan", is centered on a light-colored rectangular background.

Kirsten Sloan
Senior Policy Director
American Cancer Society Cancer Action Network