

July 20<sup>th</sup>, 2016

The Honorable Sylvia Mathews Burwell, Secretary  
U.S. Department of Health and Human Services  
200 Independence Avenue, SW Washington, DC 20201

Dear Secretary Burwell,

The undersigned organizations appreciate the opportunity to comment on the proposed non-emergency medical transportation (NEMT) waiver extension request for the Iowa Wellness Plan (IWP). We have serious concerns about Iowa's request to extend, for three years, the 1115 demonstration eliminating the mandatory NEMT benefit afforded to all Medicaid beneficiaries, including the expansion population in benchmark plans.

The latest data from the University of Iowa Public Policy Center (chosen by the state to evaluate the elimination of the NEMT benefit) found:

- Among beneficiaries reporting an unmet need for transportation, those without the NEMT benefit are 38% less likely to receive a well care visit than those with the NEMT benefit
- Beneficiaries reporting functional limitations are 145% more likely to have an unmet NEMT need than those reporting good health
- Beneficiaries reporting fair/poor physical health are 58% more likely to have an unmet NEMT need than those reporting good health
- Beneficiaries reporting fair/poor mental health are 37% more likely to have an unmet NEMT need than those reporting good health

Although we support Iowa's decision to accept federal Medicaid funding to extend coverage to low-income parents, children and other adults, the findings from the University of Iowa show that the 1115 demonstration eliminating NEMT has failed. The findings disprove the state's hypothesis that "Wellness Plan members without a non-emergency transportation benefit will have equal or lower barriers to care resulting from lack of transportation". Two years of evidence indicates that, without NEMT, Wellness Plan members have a greater barrier to care than with transportation assistance to that care.

Thank you for your consideration of our comments. If you would like any additional information or have any questions, please contact Marsha Simon ([msimon@mjsimonandcompany.com](mailto:msimon@mjsimonandcompany.com))

Sincerely,

The Community Transportation Association of America  
The Child and Family Policy Center  
The Children's Health Fund  
Health Outreach Partners  
The National Association of Community Health Centers