



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

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and Social Services

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The following information represents a record of tribal comments (transcribed verbatim) and state responses from tribal consultation on a proposed state plan amendment (SPA), adding the federally required assurances for non-emergency ground medical transportation services (NEMT).

Comment #1

We realize that the Department must comply with these new federal requirements. But we urge you to find the least burdensome and disruptive way to implement them, to consult with tribal providers as you develop your implementation plan, to minimize any new requirements for shuttle services, and to consider increasing payment rates for ground transportation services.

Response: Thank you for this comment; the department is cognizant of the need to implement the new requirements with the least disruption possible to the provider community.

Comment #2

ANHB agrees with the Department's assessment that the new requirements will decrease the availability of NEMT ground transportation resources for patients of Tribal health providers. Unfortunately, the requirements will exacerbate the acute shortage of services that is already a problem in parts of the State. There are communities in Alaska where there are no longer any taxi services available to Medicaid beneficiaries because the process to enroll, comply, and be reimbursed by the Medicaid program was so burdensome that taxi service providers stopped participating in the Medicaid program. In these communities, Tribal health providers have had to start providing transportation via shuttle system to meet patient transportation needs. In some locations, the airlines will provide shuttle service for the patients to the local hospital. Under these shuttle services, if a shuttle driver works for a health or tribal organization they are already required to pass a background check and comply with an alcohol and drug policy. The driver's record would be subject to insurance and corporate approval. This is likely also true for shuttle services provided by the airlines. In many cases, the City or State also reviews the drivers' record for a taxi or chauffeur's license, so many of the same safeguards are already in place. We urge the Department, if at all possible, to avoid imposing any new burdens on these shuttle services.

Response: Thank you for these comments representing the tribal perspective on enrollment issues under NEMT.

Comment #3

Further, it may be necessary for the Department to increase reimbursement rates for ground transportation services. There is already an acute shortage of drivers willing to enroll as Medicaid providers, and any new requirements will only make that situation worse, unless rates are increased to help compensate the drivers for the added cost and burden of meeting the requirements. The Medicaid program has a legal obligation to set payment rates high enough to ensure that Medicaid beneficiaries have the same access to services as non-Medicaid patients in the same vicinity.

Response: Thank you for this comment; the state currently reimburses billed charges, not exceeding the amount charged for the general public, for almost all NEMT providers (excluding only wheelchair vans).

Comment #4

There may also be innovative ways to address the ground transportation needs of Medicaid beneficiaries served by Tribal health organizations. ANHB invites the Department to have a conversation on the future of NEMT ground transportation services in Alaska and how the Alaska Tribal Health System can support continued access to these critical services.

Response: The state is open to engaging in discussions on this issue with tribal health organizations.

Comment #5

We appreciate the Department's work to limit the impact on health care providers and transportation providers to ensure that Medicaid beneficiaries and providers can still access necessary NEMT ground transportation resources.

Response: As always, the department appreciates tribal participation and comments regarding this proposed SPA.