

**Medicaid State Plan Amendments Public Comments**

<b>Date Submitted</b>	<b>Item Name</b>	<b>My question/comment</b>
<p>1/18/2022 17:03</p>	<p>SPA-2021-02 Medical Transportation – Consolidated Appropriations Act 2021</p>	<p>For the reasons detailed below, we urge the Louisiana Department of Health adopt the following recommendation and revise the proposed Medicaid State plan amendments posted on December 20, 2021.</p> <p>The changes proposed to the Louisiana Medicaid State Plan (Attachments 3.1-A Item 24a and Attachments 3.1-D Pages 1-4) seem to follow the Consolidated Appropriations Act of 2021 (“Act”) and federal guidance relating to Medical Transportation. It appears these changes on the federal level were aimed at traditional NEMT providers/drivers and not ambulance services. In the Act and the CMCS Informational bulletin provided on the topic, ambulance services are not mentioned or discussed.</p> <p>The Alliance feels as though placing NEMT specific requirements on ambulance services is unnecessary due to the fact ambulance services are a completely different provider type than historical NEMT providers/drivers, and these federal requirements do not fall upon ambulance services. As stated in previous comments, the two provider types are unassociated. They each must follow separate and distinct sections of law and policy. To lump the different provider types under a large umbrella of NEMT is sure to create confusion and lead to unintended consequences.</p> <p>The Alliance’s recommendation would be to change the language on Attachment 3.1-A Item 24a, Page 3 to state:</p> <p>“B. Transportation Provider Minimum Requirements</p> <p>Transportation may be provided by non-profit providers (e.g. Councils on Aging), for-profit providers (e.g. private medical transportation companies), public transit, or private individuals enrolled under the Friends and Family program (NEMT providers). Non-emergency transportation may also be provided by ambulance if medically necessary (NEAT providers). All NEMT providers must meet the following</p>

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		<p>minimum requirements:</p> <ol style="list-style-type: none"><li>1) Each provider and individual driver is not excluded from participation in any federal health care program (as defined in section 1128B(f) of the Act) and is not listed on the exclusion list of the Inspector General of the Department of Health and Human Services;</li><li>2) Each such individual driver has a valid driver's license;</li><li>3) Each such provider has in place a process to address any violation of a state drug law; and</li><li>4) Each such provider has in place a process to disclose to the state Medicaid program the driving history, including any traffic violations, of each such individual driver employed by such provider, including any traffic violations. Public transit authorities are excluded from these requirements.”</li></ol> <p>The recommended language would provide clarity to the changes and provide the separation necessary for the unassociated provider types.</p>
8/19/2021 15:05	SPA-2021-01	<p>Please approve the Act 421 State Plan. There are Louisiana families that NEED this to be approved... families that have waited for this to start well over a year. My daughter is able to attend a PDHC because she has Medicaid. Families with children that do not qualify for Medicaid cannot attend a PDHC. It saddens me to know that there are children that would greatly benefit from certain services but they do not qualify because they do not receive Medicaid. Approving this State Plan would be life altering in many ways for families with disabled children in Louisiana.</p>