



COMMISSION ON AGING

March 23, 2021

Dennis R. Schrader
Acting Secretary, Maryland Department of Health
201 West Preston Street
Baltimore, MD 21201-2399

Dear Mr. Schrader:

I am writing on behalf of the Montgomery County Commission on Aging to express our concern about a proposed change to the State of Maryland's current approach to the delivery of the Medicaid's Non-Emergency Transportation (NEMT) program. We understand that your Office is considering a change to this program that would place the Medicaid Transportation Services program under the control of a State-contracted, broker-type system. Without a better understanding of the rationale for the proposed change, we support the continuation of the program as it now exists. We believe that the current approach allows Montgomery County the flexibility to direct the delivery of such services, as appropriate for our County's need, better than a State-contracted broker. To help us understand this possible change, we are also requesting information from you about the rationale behind this policy change from the current approach.

The Montgomery County Commission on Aging (CoA) is authorized by the Older Americans Act, P.L. 116-131, and was established by Montgomery County in 1974 to advise County government on the needs, interests and issues of older adult residents, and to advocate on their behalf at the local, state and national levels.

The current State approach provides Montgomery County with the ability to administer very important Medicaid transportation services and benefits that are tailored to best meet the specific needs of our citizens. Because we have had success in Montgomery County with the current approach, our citizens trust the transportation services provided under the NEMT program, as evidenced by data from routine County surveys. We have heard of no real problems with fraud, delays in service, or over-charging of beneficiaries. The current approach works well for our County and we do not understand the need to change a program that works well.

Changing to a State-contracted broker-type of system takes away that flexibility and tailored approach from Montgomery County, moving the management and coordination of the program further away from the residents who depend upon it. We do know from some of our research of other similar programs, that a broker-type approach is subject to poor service, delays, Medicaid fraud, and problems of compliance with contractual service performance standards. These issues concern us and we do not want to see them occur with frequency for Medicaid beneficiaries in Montgomery County.

Specifically, we are asking for responses to the following questions:

- What is the rationale for moving to a broker-type approach for providing NEMT services?
- How will the State of Maryland ensure Medicaid beneficiaries in Montgomery County that this broker-type approach will serve them better than the current locally run approach?
- What specific performance metrics will be used in any contract with the broker?
- How will the State hold a broker accountable in cases of fraud, overcharging, delays, or poor service?

We look forward to your response to these questions in order for the CoA to better understand why the State seeks to move away from the current approach for providing NEMT Transportation services.

Thank you in advance for your attention to this matter.

Sincerely,
Barbara Selter sb
Barbara Selter, Chair
Commission on Aging