



April 10, 2020

The Honorable Susan Collins  
Chair  
Committee on Appropriations  
Transportation and Housing Subcommittee  
United States Senate  
Washington, D.C. 20510

The Honorable Jack Reed  
Ranking Member  
Committee on Appropriations  
Transportation and Housing Subcommittee  
United States Senate  
Washington, D.C. 20510

The Honorable David Price  
Chair  
Committee on Appropriations  
Transportation and Housing Subcommittee  
United States House of Representatives  
Washington, D.C. 20515

The Honorable Mario Diaz-Balart  
Ranking Member  
Committee on Appropriations  
Transportation and Housing Subcommittee  
United States House of Representatives  
Washington, D.C. 20515

Dear Chair Collins and Price and Ranking Members Reed and Diaz-Balart:

On behalf of the Community Transportation Association of America's nearly 1,400 members, comprised of non-emergency medical transportation (NEMT), rural, small-urban and specialized transportation providers, we are writing to you regarding the unprecedented challenges these vital community assets are facing during this COVID-19 pandemic.

We'd first like to acknowledge Congress for their leadership in including \$25 billion for public transit in the last COVID-19 stimulus package. Thanks to the relief under the CARES Act, urban and rural transit agencies are beginning to recover the costs they're incurring in response to the pandemic.

As Congress works to craft the next COVID-19 relief package, we ask that you support: Operating funds for Section 5310 agencies, the addition of Section 5310 formula guidance into the expanded eligibility concepts included in the Section 5307 and 5311 formula programs, the creation of Medicaid waivers to meet social determinants of health, the protection of the NEMT benefit in the Medicaid Program and adjusted volunteer driver reimbursement rates.

As you may know, the 5310 formula program provides funds to safely and cost-effectively transport older adults, persons with disabilities, mobility management, contracts for provision

of transportation and other uses deemed appropriate by the Federal Transit Administration (FTA). Many CTAA members, along with their potential network of providers, rely on 5310 funds to serve the nation's most vulnerable populations. We believe the following items should be taken into consideration when deliberating the next COVID-19 relief package, to offer financial and regulatory relief for Section 5310 recipients:

- Flexibility in allowable expenses to maintain service by:
  - Implementing social distancing, transit agencies have had to add vehicles and drivers to routes.
  - Increasing sanitization of vehicles, they've had to rotate vehicles more often.
  - Expanding the definition of disability to include those with autoimmune disorders who are not able to access essential services.
  - Contracting with an ambulance company that has PPE and training to provide rides of community members who are COVID-19 positive and/or need a ride to a testing facility.
- Flexibility in the definition of service delivery:
  - Mobility management – expand definition to include wellness checks. For example, calling customers the night before their ride to verify they are not showing symptoms of COVID-19. Social isolation will grow during the stay-at-home order. Expanding wellness checks for all customers will prevent the further spread of the virus.
  - Delivery of goods supporting at-risk populations – Requests are mounting for the delivery of goods; groceries, meals, food boxes, prescriptions and supplies. For example, a CTAA member in Portland, Oregon (Ride Connection) observed in their community that an ethnically specific partner teamed up with local Chinese food restaurants to provide 120 meals a day to clients that would otherwise visit their meal site. They need Ride Connection drivers and vehicles to deliver the meals.
- Temporarily relieve formula requirements for traditional/non-traditional split
- Reduce match requirements
- Fund administrative leave salaries for operations personnel
- Fund lost revenue due to COVID-19 public health emergency
- Fund purchase of personal protective equipment associated with response to the pandemic

Without the flexibility to utilize these funds during this crisis, systems are in jeopardy of significantly reducing (or even eliminating) services at a time when they are needed more than ever. In addition to these regulatory concerns, we estimate that \$500 million is needed in Section 5310 operating assistance. This is urgently necessary as it would help these providers stay afloat. With this level of enhanced flexibility, along with operating funding, transit agencies and their nonprofit partners would be best suited to work quickly in order to help ensure that COVID-19 response and recovery reaches out to the vulnerable populations of older adults and individuals with disabilities.

CTAA members also rely on funds distributed from Medicaid. Medicaid is an essential and effective source of care for the most at-risk individuals in our country. The Medicaid NEMT benefit is an essential component of this critical safety net program, as it requires state Medicaid programs to provide necessary transportation for beneficiaries to access care and positively impacts an individual's health care outcomes.

As COVID-19 continues to sweep across the country, NEMT providers are a part of the health care workforce that is on the front lines of the response. Those beneficiaries who rely on NEMT don't have the luxury of deferring an appointment, like a dialysis session, or finding other transit options. NEMT providers and their partners are acting aggressively to ensure this vital service remains available while taking measures to prevent the potential spread of COVID-19. These measures include reducing the number of beneficiaries in multi-load transports, ensuring appropriate cleaning of vehicles as supplies exist, adjusting routes to account for health care facilities that may be accepting only those patients with the virus and supporting the overall response.

We recognize that COVID-19 will have significant short- and long-term consequences on these important Medicaid providers, as well as this critical safety net program itself. Further, we expect NEMT providers to be under significant stress, with resources, funding, and staff stretched to the limit. Many NEMT providers are facing new challenges around ensuring driver safety, costs of increased sanitation measures, and how and when to prioritize trips.

Given, these significant challenges, we ask that the following items be taken into consideration:

- Creation of Medicaid waivers to meet Social Determinants of Health during the public health emergency. The current crisis is creating increased pressures for critical services, particularly transportation, at a time when the supply of these services is being stretched. Allowing Medicaid, through the waiver process, to pay for basic services for vulnerable populations, such as non-emergency medical transportation, provides immediate assistance to beneficiaries in the community, while extending a new and needed financial stream to key community-based organizations and Medicaid providers that deliver these services.
- Ensure the protection of the NEMT benefit in the Medicaid Program: Bi-partisan legislation that would authorize the NEMT benefit in the Social Security Act – including requirements for states to maintain programs to ensure appropriate use of the benefit – is pending in both the House and Senate, with a House bill recently clearing a key subcommittee. With our nation's health care system straining to address the needs of COVID-19 atop of other demands, now is the time for Congress to act to ensure the NEMT benefit is available for Medicaid's most vulnerable beneficiaries.

Finally, many CTAA members rely on volunteer driver networks to cost-effectively assist in the completion of trips, as well to bolster their existing driver pools. We encourage you to consider

reimbursing their volunteers' expenses at the IRS business mileage rate without incurring a tax liability for the volunteer. This would ensure that volunteer drivers would be offered appropriate incentives and allow many rural transit agencies to provide better, more cost-effective services.

In light of the above, we strongly encourage you to support additional operating funds for Section 5310 operations, the addition of Section 5310 formula guidance into the expanded eligibility concepts included in the Sections 5307 and 5311 formula programs, the creation of Medicaid waivers to meet social determinants of health, the protection of the NEMT benefit in the Medicaid program and adjusted volunteer driver reimbursement rates.

Attached to this letter are transportation agencies across the country that are supportive of these concepts.

If you have any questions, please don't hesitate to reach out to me at [bogren@ctaa.org](mailto:bogren@ctaa.org) or 202.247.1921. Thank you for your consideration and support.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Bogren", with a long horizontal line extending to the right.

Scott Bogren  
Executive Director

Cc: Senate Committee on Banking  
House Transportation and Infrastructure Committee

River Bend Transit  
Davenport, Iowa

Stanwood Community and  
Senior Center  
Stanwood, Washington

Potomac Valley Transit  
Authority  
Petersburg, West Virginia

Huron Transit Corporation  
Bad Axe, Michigan

Southeast Missouri  
Transportation service  
Fredericktown, Missouri

Sovereign Medical  
Transport  
Oregon City, Oregon

Brookings Area Transit  
Authority  
Brookings, South Dakota

Ripley County Transit  
Doniphan, Missouri

Cottonwood Area Transit  
Cottonwood, Arizona

Eras Senior Network  
Waukesha, Wisconsin

Love's House  
Virginia Beach, Virginia

Tri-County Council for the  
Lower Eastern Shore of  
Maryland  
Salisbury, Maryland

City of Cripple Creek  
Cripple Creek, Colorado

Onslow United Transit  
System  
Jacksonville, North  
Carolina

Access Johnson County  
Public Transit  
Franklin, Indiana

Community Action  
Program Belknap and  
Merrimack Counties  
Concord, New Hampshire

People's Express  
Whitmore Lake, Michigan

Healthy Generations Area  
Agency on Aging  
Fredericksburg, Virginia

KI BOIS Area Transit  
System  
Stigler, Oklahoma

Community Volunteer  
Transportation Company  
Peterborough, New  
Hampshire

ComfortCare  
Transportation  
San Antonio, Texas

KERT LLC  
Tampa, Florida

Central Midlands Regional  
Transit Authority  
Columbia, South Carolina

Calhoun County Senior  
Citizens Association  
Blountstown, Florida

River Cities Public Transit  
Pierre, South Dakota

Vermillion Public Transit  
Vermillion, South Dakota

Fresno County Rural  
Transit Agency  
Fresno, California

Macon County Transit  
Franklin, North Carolina

Interurban Transit  
Authority  
Douglas, Michigan

Natchez Transit System  
Natchez, Mississippi

Natchez Senior Citizen's  
Multipurpose Center  
Natchez, Mississippi

Ames Transit Agency  
(CyRide)  
Ames, Iowa

Heart of Iowa Regional  
Transit Agency (HIRTA)  
Urbandale, Iowa

Sunset Empire  
Transportation District  
Astoria, Oregon

Benzie Transportation  
Authority  
Beulah, Michigan

Clovis Area Transit System  
Clovis, New Mexico

Keeping Families  
Connected  
Indianapolis, Indiana

RADAR/UHSTS  
Roanoke, Virginia

Brazos Transit District  
Bryan, Texas

Penquis C.A.P., Inc.  
Bangor, Maine

New River Valley  
Community Services  
Radford, Virginia

Transportation Lincoln  
County  
Lincolnton, North Carolina

Transport Central  
Plymouth, New Hampshire

VNA@HCS  
Keene, New Hampshire

Vermont Public  
Transportation Association  
Bennington, Vermont

Florida Public  
Transportation Association  
Tallahassee, Florida

Ellsworth County Council  
on Aging, Inc  
Ellsworth, Kansas

North Carolina Transit  
Association  
Greenville, North Carolina

HARTransit  
Danbury, Connecticut

People's Transit  
Huron, South Dakota

Lincoln County General  
Public Transportation  
Lincoln, Kansas

Michigan Public Transit  
Association  
East Lansing, Michigan

Kennebec Valley  
Community Action  
Program  
Waterville, Maine

Prairie Hills Transit  
Spearfish, South Dakota

Southern Iowa Trolley  
Creston, Iowa

Solomon Valley  
Transportation, Inc.  
Beloit, Kansas

Kentucky Public Transit  
Association  
Louisville, Kentucky

Oklahoma Transit  
Association  
Oklahoma City, Oklahoma

Malheur Council On Aging  
And Community Services  
Ontario, Oregon

Frankfort Transit  
Frankfort, Kentucky

Creative Bus Sales  
Irving, Texas

Tulsa Transit  
Tusla, Oklahoma

MAGB Transportation, Inc.  
Fairview, Oklahoma

Minnesota Public Transit  
Association  
St. Paul, Minnesota

Ottawa County  
Transportation  
Minneapolis, Kansas

Mountain Express  
Crested Butte, Colorado

Colorado Valley Transit  
District  
Columbus, Texas

James River Senior Center  
and Public Transit  
Jamestown, North Dakota

ASBDC, Inc.  
Aspermont, Texas

Pennyrille Allied  
Community Services  
Hopkinsville, Kentucky

ROCS  
Wagner, South Dakota

Northeast Kentucky  
Community Action Agency  
Olive Hill, Kentucky

Middle Kentucky  
Community Action  
Partnership, Inc.  
Jackson, Kentucky

Harlan County CAA  
Harlan, Kentucky

RTEC  
Mount Vernon, Kentucky

Medical Motor Service of  
Rochester and Monroe  
County Inc.  
Rochester, New York

Sunset Home Inc  
Concordia, Kansas

Sussex County Skylands  
Ride/Transit  
Newton, New Jersey

Saline County Area Transit  
Western, Nebraska

Murray Calloway Transit  
Authority  
Murray, Kentucky

CT Association for  
Community  
Transportation  
Canton, Connecticut

Bluefield Area Transit  
Bluefield, West Virginia

Arrowhead Transit/AEOA  
Virginia, Minnesota

Imoveu Inc.  
Port Sainte Lucia, Florida

Cadillac-Wexford Transit  
Authority  
Cadillac, Michigan

Warren County  
Department of Human  
Services - Division of  
Administration  
Belvidere, New Jersey

Pelivan Transit  
Big Cabin, Oklahoma

Easy Ability, LLC  
Grayslake, Illinois

Region 6  
Planning/Peoplerides  
Marshalltown, Iowa

Charlevoix County Transit  
Boyne City, Michigan

Freedom Road  
Transportation Authority  
Lake Orion, Michigan

Indian River Transit/Senior  
Resource Association  
Vero Beach, Florida

rabbittransit  
York, Pennsylvania

Community Transit of  
Watertown/Sisseton, Inc.,  
Inc.  
Watertown, South Dakota

Aberdeen Ride Line  
Aberdeen, South Dakota

Marshalltown Municipal  
Transit  
Marshalltown, Iowa

South West Transit  
Association  
Fort Worth, Texas

Cecil Transit  
Elkton, Maryland

Buckwheat Express  
Kingwood, West Virginia

Southern Area Agency on  
Aging  
Martinsville, Virginia

Delmarva Community  
Services, Inc.  
Cambridge, Maryland

Panhandle Trails Intercity  
Public Transit  
Alliance, Nebraska

Dunn County  
Menomonie, Wisconsin

Volunteer Transportation  
Center  
Watertown, New York

Michael Jordan  
Transportation Service  
Ridgeland, Mississippi

Clare County Transit  
Harrison, Michigan

Specialty Care  
Transportation  
Greensboro, North  
Carolina

ITCurves  
Gaithersburg, Maryland

Daniel Boone Community  
Action Agency, Inc.  
Manchester, Kentucky

Lincoln County Transit  
Newport, Oregon

Golden Spread Rural  
Frontier Express Coalition  
Clayton, Michigan

BAWAC, INC  
Florence, Kentucky

Fresno Economic  
Opportunities Commission  
Fresno, California

Northfield's Human  
Services, Inc.  
Whitmore Lake, Michigan

Harford Transit LINK -  
Harford County  
Government  
Abingdon, Maryland

Okanogan County Transit  
Authority  
Okanogan, Washington

Metropolitan Family  
Service  
Portland, Oregon

Paratransit Services  
Bremerton, Washington

Virginia Regional Transit  
Purcellville, Virginia

Bennett's Transportation  
Co. LLC  
Falmouth, Kentucky

Pawnee Mental Health  
Services  
Concordia, Kansas

Housing Authority  
Norfolk, Virginia

Fairmont-Marion County  
Transit Authority  
Fairmont, West Virginia

OATS, Inc.  
Columbia, Missouri

Project Amistad  
El Paso, Texas

CASTA  
Denver, Colorado

Nashua Transit System  
Nashua, New Hampshire

Scotts Bluff County Public  
Transit  
Gering, Nebraska

Community Development  
Inc.  
Richton, Mississippi

Perry JFS  
New Lexington, Ohio

California Association for  
Coordinated  
Transportation (CALACT)  
Sacramento, California

Transportation  
Management, Inc.  
St. Joseph, Michigan