April 29, 2021

Acting Administrator Liz Richter  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Hubert H. Humphrey Building  
200 Independence Avenue, S.W.  
Washington, DC 20201

Re: Washington State Medicaid Transformation Project Section 1115 Demonstration Waiver Amendment Request

Dear Acting Administrator Richter:

AARP, on behalf of our 38 million members and millions of older Americans nationwide, appreciates the opportunity to submit comments on Washington State’s Medicaid Transformation Project Section 1115 Demonstration Waiver amendment request. While we note the importance of ongoing services under this waiver – including services to unpaid family caregivers and individuals at risk of using future Medicaid long-term services and supports (LTSS), supportive housing, and supported employment services – AARP’s comments will specifically focus on the LTSS presumptive eligibility (PE) and LTSS transportation services changes proposed in this waiver amendment.

AARP supports both the presumptive eligibility and the transportation services changes that will help more Washingtonians access the services and supports they need. Washington State is requesting an amendment to extend the PE process to clients discharging from acute care hospitals and those who are diverting from community psychiatric hospitals and need to access LTSS. Extending PE to cover individuals discharging or diverting from hospitals to LTSS would mean individuals could access immediate, essential services prior to a final financial eligibility determination and a full functional eligibility assessment. This would include access to appropriate LTSS through Community First Choice and 1915(c) waivers. Beginning services immediately, rather than first waiting to determine financial eligibility, can make the difference between someone returning home from a hospital, staying at home, or entering an institution that he or she is unlikely to ever leave.

Washington State is also requesting a definition change for transportation to authorize transportation to community events that are not authorized in conjunction with the delivery of a waiver service. With this change, Washington State will offer transportation in accordance with
the participant’s service plan to facilitate their access to waiver and other community services, activities, and resources as specified by the participant’s service plan. This an important person-centered approached that would enable access to services, such as meal programs provided in the community, increase access to critical supports and community resources, and help combat social isolation. Implementing changes, such as the ones proposed in this waiver amendment, help demonstrate why Washington State ranked second overall in state LTSS system performance in the 2020 Long-Term Services and Supports State Scorecard.

Thank you again for the opportunity to comment in support of these important changes in this waiver amendment. If you have any additional questions, feel free to contact me or have your staff contact Rhonda Richards on our Government Affairs staff at rrichards@aarp.org.

Sincerely,

[Signature]
David Certner
Legislative Counsel and Legislative Policy Director
Government Affairs