



185 Berry Street
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November 16, 2018

The Honorable Alex M. Azar II
Secretary
U.S. Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Avenue, SW, Room 600E
Washington, DC 20201

RE: Request for Information by the Secretary of the U.S. Department of Health and Human Services, acting through the Assistant Secretary for Planning and Evaluation, under Section 2(d) of the Improving Medicare Post-Acute Care Transformation (IMPACT) Act of 2014

Dear Secretary Azar:

Lyft appreciates the opportunity to comment on this Request for Information. We are a transportation network company (TNC) that introduced peer-to-peer, on-demand ridesharing in 2012. Today, through our ridesharing platform, Lyft's friendly, safe, affordable transportation options are available to more than 96% of Americans and provide over 10 million rides per week. We are committed to leveraging our service to help improve lives, particularly when it comes to addressing the social determinants of health – of which transportation is foundational.

We commend the Department of Health and Human Services (HHS) through the Assistant Secretary for Planning and Evaluation for seeking information on how health plans and providers serving Medicare beneficiaries identify beneficiaries with social risk factors and address their specific needs. We share your view that social risk factors – such as transportation, income, education, race and ethnicity, employment, housing, food, community resources, and social support – play a major role in health. In particular, we at Lyft are concerned about the 3.6 million Americans who delay or miss care each year due to transportation issues.¹ Patients who miss appointments due to transportation obstacles cost the health care industry \$150 billion in lost revenue annually.²

¹ <https://medcitynews.com/2017/01/5-ways-healthcare-transportation-must-change-2017/>

² <https://www.nytimes.com/2018/08/09/business/health-care-transportation.html>



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Lyft's non-emergency medical transportation (NEMT) services provide a reliable solution to this gap in transportation for patients. NEMT ensures transportation to and from providers for situations that do not involve immediate threat to the life or health of the beneficiary. Florida State University found that if just one percent of NEMT resulted in the avoidance of an emergency department hospital visit, the payback to the state would be approximately \$11.08 for each dollar the state invests in its medical transportation program.³

Lyft has been at the forefront of partnering with health plans and providers to provide NEMT services. In 2016, Lyft began its partnership with CareMore Health, a physician-led integrated care delivery system that operates Medicare Advantage plans. CareMore Health and Lyft launched a pilot program in Southern California to assess the impact of Lyft's NEMT services on patient experience and costs. The study found that our partnership reduced transportation wait times by 30 percent and the average cost per-ride fell 32.4 percent from \$31.54 to \$21.32.⁴

Reducing per-ride costs allowed Lyft and CareMore Health to expand the program system wide throughout the course of 2017. We now offer rides throughout all CareMore Health Medicare Advantage markets, reaching 75,000 patients across California, Nevada, Arizona, and Virginia. By the end of 2017, CareMore Health provided 91 percent of its curbside-to-curbside, ambulatory rides through Lyft accounting for up to 7,000 rides per month, and a total of 68,993 rides over the course of 2017.⁵ The expansion of their NEMT benefit allowed Lyft and CareMore Health to provide an additional 28,000 rides (a 12 percent increase) at no additional cost.⁶ Even more importantly, since the expansion of the pilot to the entire CareMore Health system, 96 percent of patients reported in a survey that they felt safe or very safe using Lyft-based rides through CareMore and 98 percent said they were satisfied or very satisfied with Lyft's NEMT services.⁷

Our partnership with CareMore Health also allowed us to address new technological and cultural barriers for seniors. For example, some CareMore Health members felt uncomfortable distinguishing Lyft cars from other cars on the street, so we developed a placard with the Lyft logo and designated wait stations to help riders easily identify their Lyft ride. CareMore Health and Lyft also collaborated on senior sensitivity trainings on a voluntary basis for Lyft's independent contractor drivers to educate them on how to interact with an elderly client base and make them feel more comfortable with Lyft services.

³ http://www.fdot.gov/ctd/docs/aboutusdocs/roi_final_report_0308.pdf

⁴ <https://jamanetwork.com/journals/jama/article-abstract/2547765>

⁵ <https://www.healthaffairs.org/doi/10.1377/hblog20180907.685440/full/>

⁶ <https://www.healthaffairs.org/doi/10.1377/hblog20180907.685440/full/>

⁷ <https://www.ajmc.com/focus-of-the-week/caremore-finds-success-using-lyft-to-transport-medicare-beneficiaries-to-appointments>



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In addition to our partnerships with health plans, Lyft also partners with providers to offer NEMT services. In November 2016, as just one example, Lyft collaborated with Denver Health, a large safety net hospital that provides health care for approximately 150,000 individuals, to order transportation services for recently discharged patients and patients in need of transportation to and from outpatient clinical appointments.⁸ During the initial three months⁹ of our partnership, Denver Health ordered more than 200 rides from Lyft. Prior to the partnership, patient advocates at Denver Health received daily complaints about the lack of adequate transportation. Since the launch of Lyft services, patient advocates have ceased receiving complaints about transportation.¹⁰

On average, the cost per ride for Denver Health is just \$7 and the service is provided freely to patients within a 20-mile radius of the hospital.¹¹ Denver Health has paid for more than 4,000 rides since the beginning of the program.¹² Furthermore, Denver Health has found that Lyft NEMT services are a great benefit to patients for whom English is a second language and navigating other transportation options can be especially challenging.¹³

Lyft is also working to help people with disabilities increase their mobility. In fact, 75 percent of Lyft passengers who are living with a disability say Lyft has increased their mobility.¹⁴ Our ride sharing service makes running errands, going to doctors appointments and heading to work or class easier for individuals who cannot drive or for whom public transportation poses a challenge. Lyft partners with the National Federation of the Blind and the National Association of the Deaf to expand transportation options for individuals who are blind or low vision and deaf or hard-of-hearing, and to ensure the Lyft app is a usable interface for both. Lyft also partners with the National Down Syndrome Society, helping Americans with intellectual or developmental disabilities enjoy significantly improved transportation options and

⁸ <https://www.aha.org/news/insights-and-analysis/2018-03-01-case-study-denver-health-medical-center-collaborates-lyft>

⁹ <https://www.aha.org/news/insights-and-analysis/2018-03-01-case-study-denver-health-medical-center-collaborates-lyft>

¹⁰ <https://www.aha.org/news/insights-and-analysis/2018-03-01-case-study-denver-health-medical-center-collaborates-lyft>

¹¹ <http://www.denverhealthfoundation.org/the-foundation/newsroom/denver-healths-new-program-utilizes-lyft-to-get-patients-home-safely>

¹² <http://www.denverhealthfoundation.org/the-foundation/newsroom/denver-healths-new-program-utilizes-lyft-to-get-patients-home-safely>

¹³ <https://www.aha.org/news/insights-and-analysis/2018-03-01-case-study-denver-health-medical-center-collaborates-lyft>

¹⁴ <https://take.lyft.com/economic-impact/>



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independence through ridesharing. Lyft is committed to ongoing progress toward better understanding and advancing its ability to improve transportation for people with disabilities.

Additionally, Lyft is concerned with the impact the lack of access to reliable transportation has on social isolation and consequential health effects. According to AARP, more than 8 million adults over the age of 50 are affected by isolation.¹⁵ Isolation can be quantifiably measured using indicators such as the size of one's social network and frequency of social engagement, access to transportation and ability to access resources and information. Furthermore, isolation is often the result of multiple causes such as poor physical and/or mental health, poorly designed communities and lack of resources. AARP has found that the health risks of prolonged isolation are equivalent to smoking 15 cigarettes a day.¹⁶

The lack of accessible and affordable transportation options and loss of the ability to drive contribute to social isolation. About 21 percent of individuals over 65 do not drive, many for health reasons, and many baby boomers do not have children or spouses to drive them.¹⁷ Furthermore, more than half of the U.S. non-driving population age 65 and over stays home on any given day because they don't have transportation.¹⁸ Lyft allows seniors to retain independence and reduce social isolation through our easy-to-use, on-demand ride services. In addition, we have partnerships with senior living communities such as Brookdale Senior Living, one of the largest operators of senior living facilities in the country and Life Care Services, the third largest manager of full-service senior living communities.

Finally, we are incredibly encouraged by preliminary results of a study conducted by the University of Southern California's 2018 Body Computing Conference found that access to transportation via Lyft rides improve quality of life for seniors by 90 percent. The research was conducted through a partnership between Lyft and the University of Southern California Center for Body Computing in collaboration with UnitedHealthcare and the AARP Foundation. Over a three month period, 150 seniors living with chronic conditions in the Los Angeles area had access to unlimited Lyft rides, with a strong emphasis on doctor's appointments. Most of the participants lived alone and were either retired, unable to work or had a disability. 68 percent

¹⁵ <https://connect2affect.org/about-isolation/>

¹⁶ <http://connect2affect.org/about-isolation/>

¹⁷ <https://www.nytimes.com/2018/08/09/business/health-care-transportation.html>

¹⁸ <https://www.aarp.org/content/dam/aarp/livable-communities/learn/transportation/waiting-for-a-ride-transit-access-and-americas-aging-population-aarp.pdf>



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of seniors said that Lyft's services made it easier to travel to medical visits and 74 percent said it increased their social visits,¹⁹ drastically decreasing feelings of loneliness and social isolation.

In closing, Lyft appreciates HHS' focus on the social determinants of health and social isolation as a means of confronting other health care issues. Health plans and providers are central in this fight, and we encourage HHS to provide additional flexibility in this space, allowing them to utilize their limited resources in creative, impactful ways including partnering with TNCs. We believe Lyft can play an even greater collaborative role with partners in all corners of health care and across communities to address these costly health risk factors if the appropriate incentives are encouraged throughout the system.

Thank you for the opportunity to comment on the Request for Information. For further questions, please contact Jake Swanton (jswanton@lyft.com) on our federal policy team.

Sincerely,

Lauren Belive
Director of Federal Public Policy

¹⁹ <https://www.fastcompany.com/90244794/how-free-lyft-rides-can-dramatically-improve-life-for-senior-citizens>