

February 14, 2022

The Honorable Rosa DeLauro  
Chair, House Appropriations Committee,  
Subcommittee on Labor, Health and Human  
Services, Education, and Related Agencies  
2358-B Rayburn House Office Building  
Washington, DC 20515-6024

The Honorable Patty Murray  
Chair, Senate Appropriations Subcommittee  
on Labor, Health and Human Services,  
Education, and Related Agencies  
156 Dirksen Senate Office Building  
Washington, DC 20510

The Honorable Tom Cole  
Ranking Member, House Appropriations  
Subcommittee on Labor, Health and Human  
Services, Education, and Related Agencies  
2358-B Rayburn House Office Building  
Washington, DC 20515-6024

The Honorable Roy Blunt  
Ranking Member, Senate Appropriations  
Subcommittee on Labor, Health and Human  
Services, Education, and Related Agencies  
156 Dirksen Senate Office Building  
Washington, DC 20510

Dear Honorable Chairs and Ranking Members:

The 56 undersigned advocacy and stakeholder organizations are writing in support of adding the following report language to the FY22 omnibus bill to delay further implementation of CMS' Center for Medicare and Medicaid Innovation (CMMI) Repetitive Scheduled Non-Emergent Ambulance Transport (RSNAT) model.

The Committee strongly urges the Centers for Medicare and Medicaid Services (CMS) to delay further implementation of the Prior Authorization of Repetitive, Scheduled Non-Emergent Ambulance Transport (RSNAT) because the model fails to provide appropriate alternative transportation to dialysis services and diabetes-related wound care for low-income beneficiaries with no other means of transportation.

The Committee further urges CMS to provide a report within ninety days to L,HHS Appropriations Subcommittee and the Energy and Commerce Committee on revisions to the model to ensure that the RSNAT model will not disproportionately adversely affect low income, minority and rural beneficiaries with end stage renal disease and wounds caused by uncontrolled diabetes.

The RSNAT model is a reasonable program integrity initiative that uses prior authorization to deny ambulance services to beneficiaries that do not meet Medicare's qualifying criteria. Without modifications, however, the model has the potential to leave vulnerable Medicare beneficiaries without access to lower cost NEMT to kidney dialysis and diabetic wound care services which account for a majority (85%) of beneficiaries accessing scheduled health services.

While we agree that ambulances are an expensive and inappropriate mode of transport to dialysis and wound care for almost all Medicare patients, RSNAT has highlighted the need for an

appropriate transportation alternative for low-income Medicare beneficiaries, both full and partial dual eligibles.

Nearly half of the Medicare beneficiaries who lost ambulance service in the model are dual-eligibles enrolled in both Medicare and Medicaid. RSNAT has resulted in a shifting of transport service to Medicaid NEMT for full dual eligibles (who will need navigation assistance to access Medicaid NEMT). However, the partial dual eligibles do not qualify for Medicaid NEMT and have no alternative transportation.

We thank you in advance for giving this request your fullest consideration.

Sincerely,

AIDS Action Baltimore  
AIDS Alabama  
AIDS Alabama South  
AIDS Foundation of Chicago  
Allies for Independence  
American Academy of HIV Medicine  
American Association of People with Disabilities  
American Association on Health and Disability  
American Federation of County and Municipal Employees  
American Kidney Fund  
American Network of Community Options and Resources  
American Public Transportation Association  
American Therapeutic Recreation Association  
Amida Care  
The Arc of the United States  
Association of Programs for Rural Independent Living (APRIL)  
Autistic Self Advocacy Network  
California Dental Association  
Center for Autism and Related Disorders  
Center for Public Representation  
Children's Health Fund  
Community Transportation Association of America  
Dialysis Patient Citizens  
Disability Rights Education and Defense Fund  
Easterseals  
Equality NC  
Families USA  
First Focus Campaign for Children  
Global Alliance for Behavioral Health and Social Justice  
Greater WI Agency on Aging Resources, Inc. (GWAAR)  
HIV Dental Alliance

HIV Medicine Association  
Hudson Valley Community Services  
Lakeshore Foundation  
Los Angeles LGBT Center  
Lutheran Services in America  
Medicare Rights Center  
Mental Health America  
National Adult Day Services Association (NADSA)  
National Association for Children's Behavioral Health  
National Association of Area Agencies on Aging (N4A)  
National Association of Nutrition and Aging Services Programs (NANASP)  
National Council on Aging  
National Healthcare for the Homeless Council  
Nevada Disability Coalition  
Pennsylvania Council on Independent Living  
Schizophrenia and Related Disorders Alliance of America  
SKIL Resource Center  
The Michael J. Fox Foundation for Parkinson's Research  
The Transportation Alliance  
Treatment Action Group  
Treatment Communities of America  
United Spinal Association  
WI Association of Mobility Managers (WAMM)  
Wisconsin Aging Advocacy Network (WAAN)  
Wyoming Patients Coalition

cc:

Stephen Steigleder, Clerk  
House Appropriations Committee Labor, Health and Human Services, Education and Related  
Agencies Subcommittee

Susan Avcin, Clerk  
House Appropriations Committee Labor, Health and Human Services, Education and Related  
Agencies Subcommittee

Becky Salay, Professional Staff Member  
House Appropriations Committee Labor, Health and Human Services, Education and Related  
Agencies Subcommittee

Kathryn Salmon, Professional Staff Member  
House Appropriations Committee Labor, Health and Human Services, Education and Related  
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Alex Keenan, Subcommittee Staff Director  
Senate Appropriations Committee Labor, Health and Human Services, Education and Related  
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Kelly Brown, Professional Staff Member  
Senate Appropriations Committee Labor, Health and Human Services, Education and Related  
Agencies Subcommittee

Laura Friedel, Subcommittee Clerk  
Senate Appropriations Committee Labor, Health and Human Services, Education and Related  
Agencies Subcommittee

Ashley Palmer, Professional Staff Member  
Senate Appropriations Committee Labor, Health and Human Services, Education and Related  
Agencies Subcommittee