



July 19, 2024

The Honorable Mark Takano  
Ranking Member  
Committee on Veterans Affairs  
U.S. House of Representatives  
Washington, DC 20515

Dear Ranking Member Takano:

Our organizations respectfully request that you support the VA Emergency Transportation Access Act (H.R. 5530) when the bill comes before the full Veterans Affairs Committee. H.R. 5530 is essential to protecting access for veterans to vital 9-1-1 emergency and urgent interfacility ground ambulance services. Our organizations look forward to working with you and the Committee to move the bill through the House.

Under the final rule entitled *Changes in Rates VA Pays for Special Modes of Transportation*, the Department of Veterans Affairs (VA) would reimburse for non-contracted ground ambulance services at the lesser of the actual charge or Medicare ambulance rates. As demonstrated by two Government Accountability Office (GAO) reports and acknowledged by the Congress through legislating temporary add-on payments, Medicare rates are below the cost of providing ground ambulance services. Basing more VA reimbursement on Medicare rates would deteriorate the ability of ground ambulance service organizations and fire departments to provide critical and often lifesaving ground ambulance services to veterans and entire communities.

In recognizing the below cost Medicare reimbursement, Congress directed the Centers for Medicare and Medicaid Services (CMS) to collect ambulance revenue and cost data from ground ambulance service organizations and fire departments. Due to the COVID-19 public health emergency, CMS delayed for two years the beginning of the collection of data but have now completed the first round of submissions. The VA should not be basing reimbursement on additional VA health care programs on a flawed payment system. More time with the implementation of the final rule would provide CMS, MedPAC and the Congress an additional period to reform the Medicare ambulance fee schedule and allow the industry to work with the VA on establishing more sufficient reimbursement rates.

The VA has stated that ambulance service organizations can contract with their local VA facility to be paid at higher rates. While ambulance service organizations can try to negotiate a contract with the VA at higher than Medicare rates, ambulance service organizations have little leverage as they must respond to every 9-1-1 call and emergency request regardless of the ability of the patient to pay and the VA can simply pay the Medicare rate. More importantly, a majority of ambulance transports of veterans are to the closest hospital emergency department which is not a VA facility and thus the VA contract does not cover the veteran.

There are approximately 10,500 ground ambulance service organizations and fire departments in the United States that bill for their services. Ground ambulance service organizations are primarily small and often rural operations that transport only one or two patients a day. For there to be a VA contract in place to cover every transport of a veteran poses an enormous and time-consuming challenge. According to the VA, there are currently only a few hundred contracts with ground ambulance services organizations.

The American Ambulance Association (AAA), International Association of Fire Chiefs (IAFC), International Association of Firefighters and the National Association of Emergency Medical Technicians (NAEMT) represent the providers of vital emergency 9-1-1 and urgent interfacility ground ambulance services and the paramedics emergency medical technicians (EMTs) who deliver the direct medical care and transport for every community across the United States. Our paramedics, EMTs and firefighters are on the front lines of providing vital health care to our veterans.

We strongly support the approach outlined in H.R. 5530 to protect ambulance access for veterans and establish a data-driven process that requires the VA to consult with Veteran Service Organizations, ambulance industry experts, and with the Centers for Medicare and Medicaid Services in order to ensure a more fair and equitable ambulance reimbursement rate and hope you will support the bill.

We thank you for your consideration

Sincerely,

American Ambulance Association  
International Association of Fire Chiefs  
International Association of Fire Fighters  
National Association of Emergency Medical Technicians