September 5, 2012

Mark E. Miller, Ph.D.
Medicare Payment Advisory Commission
601 New Jersey Avenue, NW, Suite 9000
Washington, DC 20001

Dear Dr. Miller:

As the Medicare Payment Advisory Commission makes recommendations to the Congress on Medicare ambulance reimbursement policy, the Joint National EMS Leadership Forum respectfully requests that you take into consideration the chronic under-reimbursement of ambulance services by Medicare. The Forum is comprised of organizations that represent all aspects of the ambulance and emergency medical services community, including paramedics, emergency medical technicians, emergency physicians, ambulance services, air medical services, educators and state officials. Our organizations are dedicated to patient care and understand firsthand the importance of an adequately funded EMS system to ensure access to high-quality ambulance and emergency medical services.

We encourage the Commission to take into account the findings of the May 2007 report by the Government Accountability Office (GAO) on the costs of providing ground ambulance services to Medicare patients. In the report, the GAO determined that ambulance service providers and suppliers are reimbursed by Medicare on average 6 percent below their costs. For providers and suppliers serving super rural areas, the GAO found the disparity between Medicare reimbursement and costs to be an astounding 17 percent.

The current temporary increases in Medicare reimbursement of 2 percent urban, 3 percent rural and the super rural bonus payment are critical to the financial stability of ambulance service suppliers and providers. The extensions will help make certain that not only Medicare beneficiaries but all patients continue to have access to essential ambulance services.

Thank you in advance for your consideration.

Sincerely,

International Association of Fire Chiefs (www.IAFC.org)
National Association of EMS Physicians (www.NAEMSP.org)
National Association of Emergency Medical Technicians (www.NAEMT.org)
National EMS Management Association (www.NEMSMA.org)

National Association of State EMS Officials (www.NASEMSO.org)