



May 2, 2018

Texas Health and Human Services Commission
Attention: Rate Analysis, Mail Code H-400
P.O. Box 149030
Austin, Texas 78714-9030

Re: May 3, 2018 Public Hearing on Proposed Medicaid Rates for Ambulance Services

To Whom It May Concern:

I am writing on behalf of the Texas EMS Alliance (TEMSA) to provide stakeholder feedback on proposed Medicaid payment rates for ground ambulance services. TEMSA was founded in 2014 to serve as the stakeholder voice for Texas EMS agencies.

Texas EMS agencies play a critical role in our state's health care delivery system. The fast response and high level of care delivered by our state's EMS agencies have saved countless Texas lives. In many rural Texas communities, EMS agencies are taking on a new role as the community's health care safety net due to rural hospital closures.

Whenever HHSC considers new Medicaid proposals for ground ambulance, it is important to remember that Texas EMS agencies face very tight operating margins. In addition, Medicaid reimbursement does not come close to covering the actual costs of providing the service. Local taxpayers must cover the balance of the operating costs when government and commercial health plan payments do not cover costs. Local officials often point to the cost of operating ground ambulance service as one of their top concerns.

When HHSC proposed ground ambulance cuts in the summer of 2017, EMS agencies, local governments and the Texas Legislature made it very clear that such dramatic cuts would have a detrimental effect on the provision of 911 ambulance transport across the state. TEMSA appreciated the efforts that HHSC staff took to listen to our concerns and reconsider last summer's proposal.

As noted earlier, Medicaid's current rates do not cover 911 transport costs, and, as a result, EMS agencies will always express concern regarding any Medicaid cut. While we cannot endorse this Medicaid proposal, which is proposed to be effective on September, 1, 2018, we do appreciate HHSC's efforts to minimize the cuts as much as possible. We believe that this proposal reflects last summer's stakeholder process in which HHSC and EMS agencies worked together to help HHSC gain a stronger understanding of Medicaid's critical role in ensuring that Texans have access to 911 services.

TEMSA appreciates the high level of communication that HHSC staff members have provided to EMS agencies over the past few years. We stand by to work together in the future to increase access to care as efficiently as possible, and we appreciate HHSC's willingness to accept stakeholder feedback.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Sell".

Jonathan Sell, President
Texas EMS Alliance