

United States Senate

November 17, 2022

The Honorable Denis R. McDonough
Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, D.C. 20420

Dear Secretary McDonough:

I am writing to voice significant concern regarding the proposed rule which would alter the rates at which the Department of Veterans Affairs (VA) pays for beneficiary travel special modes of transportation.

Air ambulances add necessary diversity to emergency services options and significantly increase access to emergency medical care in the rural and remote areas of Montana and the western United States. Their services aid our nation's veterans and their fellow citizens every day to ensure safe and swift transport to care. Many members of air ambulance teams are veterans themselves, having learned emergency medicine and aviation skills in the uniformed services.

My understanding is that the VA has neglected to study the actual cost of providing air ambulance services in proposing to modify reimbursement rates and has not distinguished air ambulance services from traditional ground ambulance transportation. Instead, VA used aggregated data for ground and air ambulance transportation due to the refusal of the VA to track specific air transports. VA determined that Centers for Medicare & Medicaid Services reimbursement rates are on average 13.68% lower than costs being reimbursed under the current regulations. However, this is based on methodology that insinuates that the operating and maintenance costs of each of these life-saving emergency services are the same. This insinuation is incorrect. In fact, the Association of Air Medical Services (AAMS) has stated that the reduction in air ambulance reimbursement rates would be approximately 90% less than the current reimbursement rate for air ambulance transport.

With the number of instances of emergency care being provided by the VA exponentially increasing, it is critical the VA explores sustainable options for the future and ensures veterans living in rural areas have access to care. Unfortunately, I am concerned that the VA has not done due diligence in developing this rule, nor does it recognize the significant impact it will have on a full spectrum of emergency services, ultimately leading to air ambulances or other innovative services not being available to veterans.

I ask that the VA review the data used in support of this change in reimbursement for ambulance services, provide a timeline to develop the ability to track and differentiate between ground and air ambulance services, and implement an impact study to fully explore the consequences of such a change in reimbursement rates. I also ask that you share your conclusions with me before

taking further steps to promulgate a final rule. These reimbursements are critical in ensuring veterans receive lifesaving care when they are most vulnerable and should not be changed without accurate data and careful study.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink that reads "Steve Daines". The signature is written in a cursive style with a horizontal line underneath the name.

Steve Daines
United States Senator