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July 17, 2023

The Honorable Xavier Becerra
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Administrator Chiquita Brooks-LaSure
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244

Dr. Elizabeth Fowler, PhD., J.D.
Deputy Administrator and Director Center for Medicare and Medicaid Innovation,
Center for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

Dear Secretary Becerra, Administrator Brooks-LaSure, Director Fowler,

On behalf of the National Association of Emergency Medical Technicians (NAEMT), we are writing to express our profound disappointment in your decision to terminate the ET3 Model on December 31, 2023, two years before the originally scheduled date for conclusion of this CMMI project.

Formed in 1975 and over 90,000 members strong, NAEMT is the only national association representing the professional interests of all EMS practitioners, including paramedics, emergency medical technicians, emergency medical responders, and other professionals providing prehospital and out-of-hospital emergent, urgent or preventive medical care. NAEMT members work in all sectors of EMS, including government service agencies, fire departments, hospital-based ambulance services, private companies, industrial and special operations settings, and in the military.

As you are aware, many participants invested countless hours and financial resources implementing this Model. The Booze Allen report to the ET3 Quality Measures Committee indicated that every participant demonstrated a Net Savings to Medicare (NSM), with the average NSM per intervention of \$550. We are confused by this decision since the Model has clearly demonstrated savings to the government as well as improved patient care. In addition, Booze Allen also reported that virtually every participant was eligible for a Performance Bonus Payment (PBP).

Since the Model was first established, the EMS community has shared with your respective agencies the potential reasons for the low number of participants, including:

- Stringent requirements for engagement of a Qualified Healthcare Practitioner (QHP) as part of the model requirements.
- Stringent requirements for mandatory reporting of ALL patient contact information for all payers (something many participants viewed as a HIPAA violation).
- Unilateral adoption of the CMS developed Participation Agreement (PA), without the ability to make any changes, based on municipal legal requirements.
- Implementation during a Pandemic/Public Health Emergency.

We respectfully request a more detailed briefing on the reasons for the termination of the Model, and the immediate release of all qualitative data to the public. Please contact NAEMT's Director of Government Relations at kim.krenik@naemt.org or 202.365.8342 to schedule a meeting. We look forward to hearing from you.

Sincerely,

A handwritten signature in cursive script that reads "Susan Bailey".

Susan Bailey, MSEM, NRP
President, NAEMT