

Appendix 1 – Response to Public Comments

The Centers for Medicare and Medicaid Services (CMS) received one comment in response to the 60-day Federal Register Notice for CMS-10708: Proposed Repetitive, Scheduled Non-Emergent Ambulance Transport (RSNAT) Prior Authorization Process and Requirements for a Potential National Model.

Comment:

The U.S. Department of Health and Human Services through the Center for Medicare and Medicaid Services is always in a strong position to develop and test new healthcare payment, reporting and service delivery models to improve patient care, lower care and better align systems to promote patient-centered practices. The proposed continuation of information collection pursuant to Form CMS-10708 and CMS-10003 are a part of that effort.

Sector with Programs have been designed to be synergistic with and supportive of models including de facto national models that have been developed and implemented in the private sector with each model testing different features of practice redesign.

Generally, in order to institutionalize and sustain successful programs it is particularly important that the data be designed to be rigorously evaluated and positioned to succeed. The readoption of the CMS Forms here should be looked at in a light that behooves the user of the information in a chart, plot or diagram form the eases comparison of data from throughout the country.

The forms related to denial of medical coverage for payment and the proposed repetitive scheduled non-emergency ambulance transport process are examples of uses to collect the required program information in a logical, meaningful fashion for communication and pass to other providers, benefactors or stakeholders.

The continuation of this information collection should be considered for approval if it can achieve improved quality of program assessment.

Response:

CMS appreciates the commenter's feedback; however, the comment is outside the scope of this information collection request.