



1760 Old Meadow Road
Suite 500
McLean, VA 22102

Phone: (703) 506-3292
Fax: (703) 506-3292
Web: www.edpma.org

June 18, 2009

Honorable Max Baucus
Chairman
Senate Committee on Finance
511 Hart Senate Office Building
Washington, DC 20510

Honorable Charles Grassley
Ranking Member
Senate Committee on Finance
135 Hart Senate Office Building
Washington, DC 20510

Dear Chairman Baucus and Ranking Member Grassley:

I write on behalf of The Emergency Department Practice Management Association (EDPMA), the nation's largest trade association representing emergency department physicians groups and organizations that support the delivery of emergency medical care to Americans. Our membership impacts over half of the 125 million patients seen in U.S. emergency departments each year, representing one of the most important safety nets in America's health care system.

EDPMA appreciates the Committee's commitment to reforming America's healthcare delivery system. The "Description of Policy Options" papers released recently by your Committee highlight the impact of our inefficient and expensive system. We agree that our patients deserve better, and we share your goals of reducing costs and improving the quality of care and encouraging patients to receive the right care in the right setting, including in the emergency department. We applaud your leadership on health care reform, and we would like to take this opportunity to offer comments.

The services provided by emergency departments are essential, providing care not only for the sick and injured, but also for those who do not have timely access to medical care in their communities. EDPMA's members are committed to providing emergency care for Americans every hour of every day, regardless of their ability to pay for services. Our nation's emergency departments are on the front lines of medical emergencies and must be prepared for any contingency, whether pandemic flu, terrorist attack, or natural disaster.

Unfortunately, our current emergency care system is in desperate need of reform. There is an acute shortage of physicians and support staff in emergency departments at a time when demand for their services has increased dramatically. A nationwide shortage of primary care physicians also contributes to this problem; when people encounter difficulty finding primary care they visit emergency departments more frequently. While rural and underserved areas are hit particularly hard, this problem affects every American who depends on quality emergency care.

Mr. Chairman, we are pleased that you chose to address the problem of overcrowding in emergency departments in a recent press statement, and we are grateful that you recognize it as symptomatic of structural problems in our health care system. EDPMA agrees that we must pass comprehensive health care reform that provides all Americans with quality health care, including emergency services.

EDPMA has recently developed principles it supports for all health care reform proposals. First, all Americans must have access to health care, including preventative care, trauma care, and mental health resources. Without adequate access to this care, many patients currently wait until a medical condition worsens before they seek treatment at an emergency department. Second, health care services must be supported by adequate economic resources that are required to deliver that care. Payments for emergency services, especially in areas with many uninsured or underinsured patients, are decreasing. This situation threatens the continued ability for emergency physicians to serve these communities. Third, all Americans should have health care coverage, and such coverage plans should provide reasonable protection from financial ruin. Finally, administrative requirements should not unnecessarily erode time and resources intended for patient care. Health Information Technology must be implemented to eliminate administrative complexities and create a more efficient health care system.

We believe our principles are consistent with the objectives of health care reform described in the Committee's option papers as well as with the eight principles advocated by President Obama. We have highlighted a few specific issues discussed in the options paper below.

In the first options paper, "Transforming the Health Care Delivery System: Proposals to Improve Patient Care and Reduce Health Care Costs," the Committee states with regards to hospital readmissions on page 14, "The Committee's proposal would take steps to reduce avoidable and preventable hospital readmissions and establish new payment incentives intended to improve patient care through encouraging greater care coordination among acute hospitals and post-acute providers." EDPMA supports efforts to reduce avoidable hospital readmissions and to encourage greater care coordination among providers. However, we are concerned that the policies outlined could have serious unintended consequences for patients. As providers of emergency care, our first allegiance must be to the patient's urgent and emergent health care

needs as we find them. If a Medicare beneficiary's immediate medical needs merit admission, the patient should be admitted regardless of an earlier hospital stay. While some readmissions may be preventable, others are not. We urge the Committee to provide adequate protections to ensure that medically necessary readmissions are not discouraged directly or indirectly due to payment ramifications.

In the second options paper, "Expanding Health Care Coverage: Proposals to Provide Affordable Coverage to All Americans," the Committee included emergency services in all benefit packages made available to the non-group and small group markets. We applaud this inclusion; it is the position of EDPMA that all benefits packages must include adequate coverage of emergency services.

Finally, we praise the Committee's inclusion of the need to address the sustainable growth rate (SGR) for the Medicare physician fee schedule. EDPMA appreciates the Committee highlighting this vital issue; we encourage the Committee to pursue policy options that include a fair and permanent fix.

EDPMA believes that inclusion of these principles and suggestions will result in the quality care the American people deserve. Thank you for your commitment, passion, and leadership on health care reform. We look forward to working with you as the Committee moves forward in developing legislation this summer. Please do not hesitate to contact me or EDPMA's Executive Director, Cheryl Cypriano, at (703) 506-3292 when considering issues facing America's emergency departments.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy Pilgrim", is written over a light yellow rectangular background.

Randy Pilgrim, MD, FACEP
Chair, EDPMA Board of Directors