



March 17, 2020

The Honorable Seema Verma
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services

Re: Ensuring nursing facility residents' access to portable x-ray services under CMS Revised Guidance for Infection Control and Prevention of COVID-19

Dear Administrator Verma:

Thank you for your efforts to ensure Americans have access to needed health care services and supplies during the coronavirus disease (COVID-19) outbreak. We write to you to express our concerns regarding nursing home residents' access to portable x-ray services and much needed changes to ensure our most vulnerable Americans continue to receive critical, life-saving services without an increased risk of contracting COVID-19. Specifically: (1) portable x-ray services are critical for nursing home residents, especially in terms of preventing unnecessary hospitalizations; and (2) portable x-ray suppliers are facing 15-56% cuts in some states, which would further limit access to these services. This is a critical time where portable x-ray suppliers need to be supported to help mitigate the spread of COVID-19.

Portable x-ray service providers are on the front lines of fighting COVID-19. We perform critical diagnostic tests on residents of long term care facilities to avoid unnecessary visits and admissions to hospitals during the COVID-19 outbreak. Portable x-ray services are used to provide specific testing for the presence of lung infiltrates/pneumonia and bone fractures. The results of the exams allow the resident's physician to order treatment within the facility, avoiding transfer to a hospital for service. This is particularly important during this outbreak. [CDC guidance](#) on prevention of the spread of the Coronavirus disease specifically recommends the use of portable x-ray to reduce the need for patient transport and to avoid unnecessary hospitalizations.

CMS issued [revised guidance](#) to nursing homes to limit the spread of COVID-19 to its vulnerable residents on March 13, 2020, for the protection of both residents of nursing homes and providers of healthcare. Critical best practices include screening providers prior to entry to the nursing home, expanded use of Personal Protection Equipment (PPE), enhanced sanitizing of testing equipment, and up to 14 day quarantining of technologists who may have tested a patient with the coronavirus disease. **All these measures increase the cost of providing portable x-ray services.**

The extra time required for daily screening of technologists entering nursing homes and the increased cost of PPE due to high demand have increased the cost of providing portable x-ray services by 10%. The CMS guidance applies to all nursing homes, including in communities without evidence of community spread or COVID-19, meaning the additional requirements apply across all portable x-ray providers. Consequently, PPE is a critical need for portable x-ray providers to continue to provide services in their communities throughout the country. Many are within days of exhausting their

supplies of protective masks. Despite this, portable x-ray providers have not been given any priority to receive PPE by the HHS Office of the Assistant Secretary for Preparedness and Response (ASPR).

We urge CMS to coordinate with ASPR and assist in ensuring access to these critical supplies. Specifically, it is critical that ASPR grant portable x-ray providers priority status aligned with other front line providers in the distribution of PPE.

We are also asking for the following specific relief from CMS to ensure portable x-ray services continue to be available:

- **Coverage of increased costs during the COVID-19 outbreak.** We are asking CMS for immediate rate relief to cover the added costs incurred by portable x-ray providers during this outbreak. We are seeking a 10% increase to the portable x-ray transportation rates in all Medicare jurisdictions while heightened infection control procedures are in place.
- **Pause in reevaluation of rates.** Several MACs have been in the process of evaluating costs related to the portable x-ray transportation services. Industry has submitted cost data to the MACs as part of the review, but those data did not reflect the added costs related to this outbreak. We are asking for the rate review process to be paused for no less than six months or until the COVID-19 outbreak subsides.

We remain committed to working with CMS to ensure nursing home residents are not placed at increased risk of contracting COVID-19, including through safely receiving portable x-ray services.

Sincerely,



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