Dear Ms. Wheeler,

On behalf of the Street Medicine Institute, an international organization representing over 80 members in the United States, the University of Southern California Division of Street Medicine in the Department of Family Medicine, and the 228 undersigned organizations and 314 individual signers, we are writing to request the addition of a Centers for Medicaid and Medicare (CMS) place of service (POS) code of “field.” A field POS code would allow people experiencing homelessness (PEH) to access eligible healthcare benefits outside the four walls of a clinic via street medicine. As the number of PEH increases along with high levels of morbidity and mortality, there is an urgent need to facilitate the delivery of street medicine practices, which demonstrate efficacy in improving the quality of care for PEH. Additionally, with the growing practice of other field-based care delivery models, the field POS code can have multiple uses resulting in increased access to care for people unable to access brick-and-mortar or mobile van settings, as well as allowing tracking of care provided through street medicine.

What is “street medicine?”

Street medicine, the act of providing healthcare in peoples’ lived environment, is a proven best practice in improving health care access and outcomes for PEH, with approximately 90 street medicine programs in operation in the United States. Street medicine was developed specifically to address the unique needs and circumstances of unsheltered homeless individuals on-site where they reside. Street medicine programs provide medical care for acute and chronic health conditions, including behavioral health care and treatment for substance use disorders, such as dispensing medications and drawing blood work on the street to decrease barriers to care. Street medicine programs collaborate with other community-based organizations to help PEH obtain IDs, social security cards, and birth certificates to create a valid medical record and establish housing placement needs, certify disability to help with SSI/SSD, sign up for medical insurance, provide transportation, and ensure continuity of care and connection with patients long enough to complete the housing process which usually takes months. During this time, we improve health and wellbeing so patients can be matched to the least restrictive housing and be healthy enough to succeed in their housing placement.

---

A recent poll conducted by the Street Medicine Institute with member programs revealed that street medicine providers face numerous barriers to sustainability and expansion, most notably the inability to be reimbursed by CMS for billable services. The poll included 80 unique programs from around the country providing over 20,000 patient visits on the street yearly. Over 90% are staffed by medical providers (physicians, PAs, and NPs) providing primary care, treatment of acute and chronic disease, vaccinations, mental health treatment, and drug and alcohol counseling. To decrease all barriers for patients, most dispense medications and draw labs on the street. Despite providing a high level of services, over 70% of respondents don’t bill for services rendered citing the lack of CMS POS code, raising questions as to the ability to seek reimbursement in this physical setting.

Though still a young field, street medicine has demonstrated encouraging results, with:

- Less than 30% of PEH who are insured have ever seen their Primary Care Physician ever vs 70% of those with Street Medicine providers who are actively engaged in Primary Care within 1 week of referral.²
- Street Medicine has demonstrated a 2/3 decrease in hospital admissions with a hospital-based street medicine consult service.¹²
- Street Medicine has demonstrated a quarter reduction in hospital length of stay for PEH through a hospital-based consult service.¹²
- Street Medicine has demonstrated improved placement in housing after a hospital admission with a hospital-based consult service.¹²
- In 2019, USC Street Medicine, in collaboration with community partners, placed 42% of all patients into housing.¹²

**How is street medicine different than mobile medicine?**

Street medicine strives to “go to the people,” and serve them in their environment where they feel comfortable, not where providers feel most comfortable. This is done via walking rounds with backpacks, usually working out of a pick-up truck or car, but is also done via horseback, kayak, or any other means to reach hard-to-reach people. The balance of power is shifted to the patient, with them as the lead of their medical team. This philosophy leads to street medicine to be practiced on the street, in the lived environment of those we serve, rather than ask them to come into our space in a mobile van that we’ve licensed. This philosophical difference between street medicine and mobile medicine is an important one, given the history of trauma many PEH have faced, and opens access to previously impossible to reach people.

**Fiscal impact of street medicine**

The true fiscal impact of taking street medicine to scale is unknown as our systems haven’t caught up with the practice to permit its widespread acceptance. Adding a POS code is part of the needed modernization. Analysis done based on data from CA and Medi-Cal per 100,000 enrollees revealed marked decreases in hospitalization, ED rates, and hospital length of stay. Based on available data, the following can be extrapolated:

1. PEH average 1.0 hospitalizations per year and 4.0 ED visits per year ³

---

² Feldman B, Robinson J, Banerjee J. (2020, October). Creating a Primer for a Street Medicine Hospital-based Consult Service to Treat the Most Vulnerable while Showing Value. Presented at International Street Medicine Symposium, virtual.
³ https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4627525/
2. Street medicine inpatient consult services are proven to decrease 30-day readmission rates from 37% to 10%\(^4\)

3. Street medicine inpatient consult service proven to decrease length of stay from 11 to 8 days\(^2\)

4. Impact on hospitalizations and hospital days
   a. Per 100,000 enrollees x 1.0 hospitalizations per year= 100,000 hospitalizations
   b. 100,000 hospitalizations x 37% readmission rate for PEH without Street Medicine= 37,000 hospitalizations
   c. 100,000 hospitalization x 10% readmissions for PEH with SM= 10,000 hospitalizations

   *Per 100,000 enrollees, lack of Street Medicine results in 27,000 avoidable hospitalizations per year vs. 1,124 for general Medi-Cal population\(^5\)

   Non-SM: 37,000 hospitalizations x 11-day length of stay= 407,000 hospital days
   SM: 10,000 hospitalizations x 8-day length of stay= 80,000 hospital days

   **Lack of Street Medicine results in 327,000 avoidable hospital days per year for PEH

5. Impact on ED visits
   a. PEH average 1.0 hospitalizations per year and 4.0 ED visits per year\(^1\)
   b. Street Medicine has been shown to decrease ED visits by 75%\(^6\)

   ***Per 100,000 beneficiaries= 400,000 ED visits x 75%= 300,000 ED visits saved

Challenges with reimbursements due to lack of a clear POS code

With evidence showing PEH aren’t well served in the existing system, and the positive impact of street medicine, and despite providing services reimbursable under CMS, the lack of clarity over the possibility of billing, the experience of billing declination, and the risk of audit, has prevented expansion and jeopardized the sustainability of essential services to our most vulnerable citizens. This is not due to the services provided since they are already reimbursable, rather the absence of an appropriate POS code. Street medicine providers have experienced billing declinations or have considered, but decided against, the use of POS codes 4, 12, 15, 16, and 99. This is understandable, as none accurately describe caring for patients under a bridge or on the street in their lived environment through street medicine. This has led to at least 70% of street medicine organizations to not bill for billable services because there is no POS code indicating a visit can take place in the field. This has also led to a lack of accurate information on the care that’s being provided which could inform better care for PEH in the future. Many more potential programs have failed to start since they would rely on grants and philanthropy for revenue, even when patients are insured.

---

\(^4\) Feldman B, Robinson J, Banerjee J. (2020, October). Creating a Primer for a Street Medicine Hospital-based Consult Service to Treat the Most Vulnerable while Showing Value. Presented at International Street Medicine Symposium, virtual.


\(^6\) https://www.advisory.com/en/daily-briefing/2017/12/01/street-medicine
**Impact on Patient Care**

Catastrophically, the creation of a large gap between benefit eligibility and benefit access exists, contributing to increased morbidity and mortality for PEH. Recognition of the legitimacy of street medicine, and the need to provide care outside of 4 walls, is also recognition of PEH’s right to life, as this is their relied upon method of receiving care.

Please consider adding a CMS POS code “field” to allow for billable services delivered outside of four walls to be reimbursed.

Thank you for your time and consideration.

Sincerely,

Brett J. Feldman, MSPAS, PA-C  
Vice Chair, Street Medicine Institute  
PO Box 421  
Ingomar, PA 15127

Director, Division of Street Medicine  
Assistant Professor of Family Medicine  
Keck School of Medicine of USC  
1000 S. Fremont Ave  
Alhambra, CA 91803  
Phone: (215) 262-7834  
Brett.Feldman@med.usc.edu

Jehni Robinson, MD, FAAFP  
Professor and Chair  
Department of Family Medicine  
Associate Dean for Primary Care  
Keck School of Medicine  
President, USC Care Medical Group  
University of Southern California  
1500 San Pablo Street  
Los Angeles, California 90033  
Phone: (626) 457-6613  
Jehni.Robinson@med.usc.edu

Irene F. McFadden  
Board Chair, Street Medicine Institute

---

ADAP Advocacy Association  
Addiction Psychiatry Fellow  
Advocate Aurora  
AHN Center for Inclusion Health  
AIDS Action Baltimore  
AIDS Alabama  
AIDS Foundation Chicago  
AIDS United  
Alameda County Health Care for the Homeless Commission  
Alaska Family Medicine Residency  
Albuquerque Health Care for the Homeless  
Alchemy Integrated Medicine  
Allegheny Health Network  
Alma Family Medicine  
Appalachian Mountain Community Health Center  
Atlantic Prevention Resources  
Bay Clinic, Inc.  
Beaumont Health
Black AIDS Institute
Boston Medical Center
Brilliant Corners
Brown Family Medicine Residency
Brown University
Care Beyond the Boulevard, Inc.
Carilion Clinic
Caring Ambassadors Program
Cascades East Family Medicine
Center for Inclusion Health, Allegheny Health Network
Central Maine Medical Center Family Medicine Residency
Central Outreach Wellness Center
Chas Community Health Association of Spokane
Chicago Department of Public Health
Chicago Street Medicine
Cincinnati Health Network
CLINICA Family Health
Clinica Sierra Vista
CMHC Street Psychiatry
Coastal Street Medicine/Mendocino Coast Hospitality Center
Colorado Coalition for the Homeless
Community Access National Network (CANN)
Community Empowerment Resources
Community Health Project LA
Covenant Community Care
Covid Clinic, Inc.
CU Street Medicine
Dade County Street Response
Department of Family Medicine, Brown University
Department of Family Medicine, University of California Davis
Department of Medicine, Keck Medical Center of USC
DESC
Detroit Street Care, Michigan State University College of Osteopathic Medicine
Dignity Health
Doctors Without Walls - Santa Barbara Street Medicine
Drexel University College of Medicine
Duke School of Medicine
Eliot CHS Homeless Services
End of Life Care for the Houseless
Fort Worth Street Medicine
Grand Rapids Street Medicine
H4H
Harbor Hospice
Hawaiʻi Department of Health
Hawaiʻi Health & Harm Reduction Center
Hawaii Homeless Healthcare Hui
Health Care for the Homeless
Health in Justice Action Lab, Northeastern University
Health Leads
Healthcare in Action
HealthPoint
HealthRIGHT 360
Heartland Health Outreach
Hep B United
Hep Free Hawaii
Hepatitis B Foundation
Hepatitis C Mentor and Support Group, Inc. - HCMSG
House of Hope
Housing First Umpqua
Illinois Public Health Institute
Illumination Foundation
Institute for Family-Centered Childbirth
Intown Collaborative Ministries
Jackson Memorial Hospital
Janian Medical Care
Johns Hopkins School of Medicine
Kaweah Health Street Medicine
Kealahou West Oahhu
Keck School of Medicine, University of Southern California
KSOM Street Medicine
L.A. County Department of Mental Health
LA Harm Reduction Network
Lehigh Valley Health Network Street Medicine
LifeLong Medical Care
Lilly's Place Affordable & Workforce Housing
Los Angeles Christian Health Centers
Los Angeles County Department of Mental Health
Louisiana State University Health Sciences Center SRCC (Student Run Community Clinics)
Loyola University of Chicago Stritch School of Medicine
Macomb County Street Medicine
Madison Area Care for Homeless OneHealth (MACH One)
Malama I Ke Ola Health Center
Marian Regional Medical Center, Family Medicine Residency Program
Maui AIDS Foundation / Maui Health
Mayo Clinic
Meadville Medical Center
Medical College of Wisconsin
Memorial Health University Medical Center - Family Medicine
Mendocino Coast Clinics
Mercy Care
MercyWatch
Miami Street Medicine
Michigan State College of Human Medicine, Spartan Street Medicine
National Health Care for the Homeless Council
National Sobering Collaborative
National Task Force on Hepatitis B
National Working Positive Coalition
Neighborcare Health
New Jersey Harm Reduction Coalition
New York University
Street Psychiatry
Streetside Clinic at Prevention Point
Stritch School of Medicine
Sulzbacher
SUNY Upstate Medical University
SUNY Upstate Medical University
Tampa Bay Street Medicine
Team PSBG LLC
The AIDS Institute
The County of Alameda (California)
The Institute for Human Services, Inc.
The Night Ministry
The Olympia Free Clinic
The Radical Hale
The Shop at Rancho Milagrito
The University of Michigan
Tiburcio Vasquez Health Center Street Health
Traverse Health Care Clinic
Treatment Action Group
TRUST clinic
Tulane Street Health Response
TUN Street Medicine
UC Davis School of Medicine
UC Riverside Street Medicine
UCLA
UMass Chan Medical School/UMass Memorial Health
Union Station Homeless Services
Unity Health Care, Inc
University District Street Medicine, University of Washington
University Health Partners of Hawai‘i
University of California, Davis
University of California, Riverside
University of Colorado, Anschutz
University of Colorado School of Dental Medicine
University of Florida, Sulzbacher
University of Florida
University of Illinois College of Medicine Rockford
University of Massachusetts Medical School, Road to Care Mobile Addiction Service
University of Miami
University of Miami Miller School of Medicine
University of North Carolina At Wilmington
UPMC
Utah Naloxone
Valley Health Partners (VHP) Street Medicine
Venice Family Clinic
Village Health Center at Father Joe's Villages
Virginia Hepatitis Coalition
Vituity
WA State Health Care Authority
Waikiki Health Center
Elson S. Floyd College of Medicine, Washington State University
WeCare Street Outreach
Well-One Health Inc.
Western Carolina University
Homer Stryker M.D. School of Medicine, Western Michigan University
Wolverine Street Medicine Program, University of Michigan Medical School
Yale Program in Addiction Medicine
YHC Clinic
ZACAH
Zumbro Valley Health Center

Individual Signers:

Abak Kayamba                      Jon Verlinde
Abby Struble                      Joseph Becerra
Adam Ciccone                      Julia Machnik
Adam Kociba                       Julia Saile
Adithya Vegaraju                  Julie Blaszczak, MD, MEHP
Adrienne Walnoha                   Julie K. Prussack, M.D.
Aisling Covell                    Justin Behlke
Alanna King                      Justin Zeien
Alex Farthing                   Justine Wu
Alexa Magsoudi                  Kacie Klott
Alexandra Barbeau              Kaitlin Prechtl
Alexandra Laykova              Kami Harless, MD
Alexis Coulourides Kogan, PhD   Kareem Khozaim
Alicia Lamb                      Kathryn Harmes
Amanda Johnson                  Katie Anderson
Amber Cargill PA-S1            Katie Foug
Ana Lopez                       Katrina Hoffman
Andrea Luna Romero            Kayla Fong
Andrew Jones, MD             Keith A. Stahl, M.D.
Andrew Nelson                  Ken L
Angela Gough, DO             Ketti Sloan
Angelo Poulich                 Kevin Huang
Anna Deligio                   Kiera Connelly
Annes Kim                      Kimberly Lynch
Annie Cardwell               Kinsey Vear
Apoorva Ravichandran
April Campbell
April Lowenthal
Aqdas Kuraishi
Arielle Tucer
Asha Atwell
Ashley Morgan Wilhelm, DO, MPH
Austin Benedict
Bailey Braum
Barbara DiPietro
Barbara Kilian MD
Barbara Siegel
Ben Talik
Benjamin Roskiewicz
Bennie Eliason
Beryl Zhou
Betsy Cunningham
Brenda Konkel
Brenda wiewel
Brett j Feldman
Bridget Croniger
Camilla Griggs
Camilo Zaks, MD, FAAFP
Carly Suriano
Carol Shetty
Caroline Magee
Carter
Catherine Freeland
Catherine Pang, MD
Catherine Santizo
Catherine Walsh Taubner, Ph.D.
Cecilia Hollenhorst
Christina Guest, MD
Christina Murphy
Christina Wang
Christine Alexopoulos
Kirsten Vitrikas
Korrine Finkbeiner
Korrinne Yurick, PA-C
Kristan Horney
Kristi Messer
Lara Elizabeth Aycock Frye
Laura Crespo Albiac
Laura Lacroix
Laurel Meyer Zdeblick
Laurel Miller
Lauren Blasen
Lauren Healy
Lauren Nguyen
Lindsey Vandergrift
Lisa Ryan
Lissie Arndt
Liz Frye
Loretta Contreras
Lori Winston, MD
Louise Amat
Louise Amat
Lucy Tamberrino
Luke Vranna
Lydia Prevost
Lynn Matis
Malak Elshafei
Marg Lawlor
Maria Green
Maria Green
Maria Green
Maria Green
Maria Green
Maria Kocab
Marina Gaeta
Marissa Martinelli
Marites Yao
Mary Stock Keister, MD
Christine Buchanan
Christine Krause MD
Christine Medaugh
Christopher Assmann
Christopher Rafalski
Clinica Sierra Vista
Colin Grant Egger PA-S
Cooper Couch, MPAP, PA-C
Corinne Feldman
Corrine Feldman
Crister Brady
D Duke, M.D.
Daniel Dolan
David Eisner, MD
David M. Deci MD
David S. Buck, MD, MPH
David Wilson
Dawn Holmes
Dawson Hill
Denise Kohl
Denise Torres
Derin Allard, DO
Diana Perez
Diana Tang
Dorit Dowler-Guerrero
Dr. Vijaybhasker Bolgam
Ebony Foster
Ebony Parker-Featherstone, MD
Edward Rosenfeld MD
Elizabeth Anderson, LSW
Elizabeth Beaty
Elizabeth Flores
Elizabeth Jones
Elizabeth Torkington, BSN, RN, PHN
Ella Monteverde-Vo
Marysol Encarnacion
Matt Kosakowski
Matt Sumethasorn
Matthew Gibson
Maura Wallace
Megan Kempa
Megan Moreh
Meghan Glaser
Meredith Hollender
Michael D. Fetters
Michael Manasterski, MD
Michael Marchiori
Michael Sean Wright
Michael Treece MD
Michelle Carver, RN
Michelle Walls
Monica Picard
Monica Sun
Naoky Tsai, MD
Naomi Whitaker NP
Natalie Parker, PA-C
Nathan Lin
Nic Helmstetter
Nicholas Hallenbeck
Nicole Ambrosio
Nidhi Patel
Nimra Ahmed
Nina Bui
Noumi Chowdhury
Nova Hou
Olivia Flessland
Olivia Strawn
Partners In Care
Payge Barnard
Philip Zazove
Puja Gellerman
Ellain Baul-Highfill
Ellen Drake
Emily Beardsley
Emily Le
Emily Vogt
Emma Flynn-Kopko
Emma Phillips
Emma Zblewski
Eric Steinbrook
Eric Webster
Erin Day
Erin Reynolds
Erin Santos
Evan Moore
Frances Rose Lendacki
Francesca Reinisch
Francina S Hoffman
Francis Yang
Francisco Dorado, MD
Gabriella Auchus
Gabriella Monteverde-Vo
Gabrielle Costello
Gabrielle Johnson
Gabryel Garcia-Sampson
Ghulam Karim Khan
Girlie Caballero
Grace Allan
Grace Frecentese
Grace Scott
Hallie Olson
Hana Murphy
Helena Turner
Hisano Tasedan
Isabella Kunkel
Jaclyn Bandell
Jacqueline Naud
Rachel Blaustein
Randi Wirfel
Rebecca Abraham
Rebecca Row
Ricardo Ismach
Ricardo Ismach
Richard Eugene Bolt, M.D.
Richard Pellizzari
Rina Breakstone
Robert Fauer MD
Roberta Reifsnyder
Robin L. Diaz, MSN RN
Robyn Bernstein
Roger Gerstle, MD
Ronnie-Lee Sneh
Rudy Wenner
Ryan McChesney
Samuel Beckey
Sanaya Irani
Sandra Valencia
Sara Hunt
Sarah Kim
Sarah Kong
Sarah Marshall
Sarah Strupp-Levitsky
Sarah Welsh
Saraswati Keeni
Savannah Vetterly
Scotti Warren, LCSW, MPH
Serena Arts
Shalyn D'Amore
Shannon Cahalan
Shelby Peters
Sonal Joshi
Sonia Otte
Sophie Roe
James Miller, MD
Jamie Hsin
Jamie Sorenson
Jane Kim
Jason Himmel
Jaynell Assman
Jaynell Assmann
Jean Aycock, M.D.
Jean Wong
Jeffrey Norris
Jen Wang
Jenna Rivera
Jenna Ure
Jennifer Cline, DNP, APRN
Jennifer Davis
Jennifer McCartney
Jennifer Wilkens
Jeremy Martinez
Jessie Langmeyer
Jessie Maupin
Joanna Haffner
Jocelyn Tovar
Johnnie Branch
Jon Carlos Gonzalez
Stacey Jung
Stephen Venable
Summer Stefanko
Suzie Zick
Tamara Arizaga
Taylor Hooks
Taylor Le
Thomas ESposito
Thomas Weiner
Tiffany Gregory
Timothy Acheson
Timothy E McNamara MD
Tobie Smith
Trang Nguyen
Trey Shaughnessy
Trishya
Tuong Pham
Vy Tran Plata
Wendy Broeren
William E Chavey
William Toepper MD
Yuk Ming Liu
Zack Bonzell
Zoey Chopra