



October 8, 2025

The Honorable Dr. Mehmet Oz
Administrator
Centers for Medicare and Medicaid Services
7500 Security Blvd.
Baltimore, MD 21244

RE: Rural Health Transformation Program

Dear Administrator Oz,

The National Rural Health Association (NRHA) writes to thank the Centers for Medicare and Medicaid Services (CMS) for its thoughtful guidance and implementation of the Rural Health Transformation Program (RHTP) in the agency's Notice of Funding Opportunity (NOFO). We are pleased to see the focus on advancing transformative change through this historic investment in rural healthcare.

NRHA is a non-profit membership organization with more than 21,000 members nationwide that provides leadership on rural health issues. Our membership includes nearly every component of rural America's health care, including rural community hospitals, critical access hospitals, long-term care providers, doctors, nurses, and patients. We work to improve rural America's health needs through government advocacy, communications, education, and research.

NRHA applauds the agency's recognition that the process of making change and innovation requires upfront investments that are frequently hard for rural communities to overcome alone. The RHTP funding will jumpstart system-wide change that will ultimately create lasting improvements to access to care, rural health outcomes, and the overall wellbeing of rural communities. We also believe transformation funds can play a critical role in maintaining access for rural communities by sustaining rural providers while transformation occurs.

Integral to the wellbeing of rural communities are rural hospitals. Rural hospitals are not simply providers but pillars in their communities, trusted institutions, and major economic engines. They often offer the best paying jobs in the surrounding area, bringing in professionals that live, work, and invest in the community. Rural hospitals are also key partners that can work with outside organizations like local schools and colleges or community-based organizations to advance workforce training or address health-related social needs and wellbeing.

As such, rural hospitals are well-positioned to use RHTP funding in a way that will drive lasting, large-scale change in rural healthcare. We ask that CMS prioritize funding state applications that put rural hospitals at the forefront of their initiatives. With the proper investment and resources, rural hospitals can achieve the strategic goals of the RHTP and successfully effectuate each state's rural health transformation plan. Funds should be allowed to both strengthen current programs and launch new efforts in rural hospitals. It is critical that RHTP funds directly go to rural communities through investments in hospitals, clinics, community-based organizations, and other local partners. While NRHA understands the important role vendors, consultants, and urban institutions play in effectuating the goals of the RHTP, we believe these partnerships must be of and for rural communities and improving rural healthcare. Allocation of funds must avoid being done in a way that competes with or draws patients away from existing rural providers.



NRHA thanks CMS again for its commitment to improving rural healthcare and health outcomes. The RHTP funds can be a game-changer in terms of strengthening rural hospitals and healthcare access in rural areas. We are ready to work alongside the agency to achieve its aims and ensure the smooth implementation of the RHTP. If you have any questions or would like to discuss the RHTP further, please contact Alexa McKinley Abel (amckinley@ruralhealth.us).

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Morgan", is positioned above the printed name.

Alan Morgan
Chief Executive Officer
National Rural Health Association