

Centers for Medicare & Medicaid Services
Questions and Answers
Open Door Forum: Ambulance
Thursday, April 11, 2024

1. Question: I was wondering when the reporting that will be happening to Congress will be made available to everyone.
 - a. Answer: CMS will report aggregated, obviously de-identified data on our website before the end of December of each year, and we will also be sending our data to MedPAC (Medicare Payment Advisory Commission) as well.
2. Question: I'm on year 3 and on cost and I think it's item 4, I don't have it in front of me. Number 12 for the total cost, it is asking for all total operating costs included, and in the previous sections where the payroll was broken down via EMTs (Emergency Medical Technicians) and paramedics, EMRs (Emergency Medical Response), and so forth—should that do, does Medicare, or does the reporting, does the payroll need to be reported in the total cost or just operating costs? Because it was a little ambiguous. I don't know where that one was kind of going. I didn't want to basically double calculate.
 - a. Answer: It's a very good instinct to stay far away from double counting. I think the sections before heading into Section 12, so from Section 7 which covers labor all the way through 11, which is a miscellaneous other costs section. Those sections and the questions in those sections ask you about very specific expenses tied to different things, like, as you mentioned in Section 7, to different types of labor. So, you need to report that all fully there. In Section 12, it's just a single question and it's not meant to be in any way additive to what you reported up to that point. It is just the total across all of your expenses for the 12-month data collection period. So, for some organizations, if you're only providing ground ambulance services and are not also, say, a fire department or hospital or other Medicare provider of services, if you're just pure pay ground ambulance, one way to think about it is that the sum of all the information on expenses you report in Sections 7 through Section 11 should about equal the total amount you report in Section 12. And that Section 12 Question 1 amount is your total organizational expenses not just for labor but across all of those other categories you're reporting on in Section 7 through Section 11.
 - i. Comment from participant: That's fine. The reason that I asked, and like I said, I had just followed up with because I'm kind of dovetailing this with my corporate return and I have my whole income statement and wage expense is one of them, which I have pulled out, so I understand what

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you're saying. Seven through 11 should basically parallel what 12 would be.

1. Answer from CMS: One quick note for others who might be in a different situation. If you are part of an organization that does things other than provide ground ambulance services, like a hospital or fire department, in that case, your answer to Section 12, Question 1, which asks about total expenses, might be quite a bit beyond larger the sum of expenses over Sections 7 to 11. That's because in 7 to 11, you're focusing just on ground ambulance expenses, and that's Section 12, Question 1, sort of the only places in GADCS where it says even including things other than ground ambulance, what are your total expenses? That applies more to some organizations than to others. In some cases, it will be a very close match. In other cases, it'll be a bigger number.
3. Question: I'm reporting this year from our 2023 section of NPI (National Provider Identifier). We're part of a county government, and our NPI relates to our health department, we share one. Guidance on how I split those out, and does it go back to what was just stated about having to report everything from our county clerk's office and then narrowing that down to EMS?
 - a. Answer: Did I hear you correctly that as part of the public health department, there may be other services you're performing, billing for, other than ground ambulance services? I think there might be 2 parts to the question, but I want to make sure I understand.
 - i. Question: Yeah. Ourselves and our health department share the same NPI and have for multiple decades. Those are the only 2 organizations that are listed under that NPI, although the primary name on it is Butler County Clerk.
 1. Answer: I'll split that up into two parts and let me answer them in turn. The first one is when you're thinking about how to report the expenses throughout Section 7 through 11, you're going to have to focus on a share of the expenses from that public health department or that budget for that public health department that's specific to your ground ambulance operation. So, there's a question in Section 2 that asks if your ground ambulance operation also provides other kinds of health care. And so, your organization would almost certainly check that off, and that is a tip to the system that will modify some of the instructions and questions you see later on, prompting you to be sure to report

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expenses and revenue only from that ground ambulance portion of your broader public health department. The second part of this question, which is also addressed in the FAQ and is probably worth the look, for Section 12, Question 1: When you're reporting the entire overall total expenses for your organization for municipal government-based organizations, you don't need to report the entire county or city or other municipality budget. If you do have an amount that is specific to ground ambulance or maybe your broader public health department, you could put that in, and that's acceptable. Some very big government-based reporters out there like FDNY (Fire Department New York) it doesn't make sense to put in the entire New York City expenditure for New York City in that Section 12, Question 1 field. So, there is an FAQ providing a little more information on that scenario for Section 12, Question 1. Then otherwise, through whatever means are most easily applied on your end, you'll need to split out any expenses that are related to other activities within the public health department from your ground ambulance activities and expenses that you report to GADCS.

4. Question: Once the aggregated de-identified data is put forth, will it be separated for private EMS, fire-based EMS, and such so we can compare apples to apples and oranges to oranges?
 - a. Answer: The data will be aggregated, and it's important to circle back to the original design of the sampling plan for GADCS. In fact, CMS very purposefully sampled organizations in such a way that there was good representation across many different organizational characteristics in each of the 4 years of the GADCS. So, to answer your question, I think revisiting those distinctions in terms of ownership, service area, population density, urbanicity, volume, and provider versus supplier status—those 4 divisions—I expect that to be important in how results are aggregated and shared publicly.

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