

Centers for Medicare & Medicaid Services
Questions and Answers
Open Door Forum: Ambulance
Thursday, August 18, 2022

1. Question: I was wondering if ambulance providers are able to or would you consider allowing ambulance providers to preemptively apply for hardship exemptions before being notified of potential reductions especially when you look at providers in areas like Eastern Kentucky? I'm a provider in Ohio but as I look at what's happened in Appalachia, I think we can all agree they are under significant burden, especially if they've been selected as year one or year two providers. I don't think it's reasonable to expect them to be able to produce what all of us are being asked to produce. Is that something that we can look to CMS to give them some grace on?
 - a. Answer: The process for submitting hardship exemption requests would be after you receive the notification that you are subject to the 10 percent payment reduction. We're sorry to hear what's going on in Eastern Kentucky. We are limited by the statute where we can only provide significant hardship such as a natural disaster, bankruptcy, or similar situation. Proposed changes that we want to automate the requests. And we're proposing to automate them instead of submitting the request to our Ambulance Open Door Forum website, or excuse me, Ambulance Open Door Forum email. We are looking to automated to be submitted through our GADS portal once it becomes operational. So, there's no proposed changes to the process in which we will notify you with regard to the 10 percent payment reduction. And then you have up to 90 days to submit your hardship exemption request. There's no change with that. The change is that you wouldn't send it into the information into our ODF email that you would submit it directly into our GADCS portal. I hope that clarifies.
 - i. Question: It does. It just if you're able to propose a change and then make a change my question was, could we propose a change to preemptively allow for people to apply for hardship rather than waiting for somebody to tell them that they're deficient? If we know that the deficiency is going to exist rather than say, "Hey, you have failed." We see that the failure is going to come or be an unnecessary burden allow them to say, "Hey, we're struggling here. We need some grace. Can you please allow us to have some room to survive this disaster and give us a few extra months to collect what you're asking?" That's the change I'm asking for.

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1. Answer: That change is not what we are proposing in this Calendar Year 2023 Physician Fee Schedule proposed rule.
2. Our company has been selected for Year 1. So, it looks like we'll begin our data collection October 1 of 2022 through September 30 of 2023. My question is this the data that you're looking for we are to create that in an Excel format and provide you with a PDF file of our backup data. Is that correct?
 - a. Answer: Some organizations have spreadsheets or other approaches that they've developed internally to keep track of this information through the data collection period. There is no requirement to track any of the data in an Excel or other format. There's also no requirement to submit anything in PDF. The questions will be proposed to you and then answered through a web-based portal. It's kind of like a Survey Monkey or another kind of web-based survey feed to the instrument itself. The questions you'll have to answer are available on the GADCS website in a PDF that you can, if you'd like, print out and use as a way to structure your data collection, pencil in answers now, assemble the right kind of information so that when the web-based portal is available, which will be in the coming months, you can port over responses.
 - i. Comment: Because what I'm doing I'm looking at the spreadsheet or the Medicare Ground Ambulance Data Collection. And I opened up the Medicare Ground Ambulance Data Collection Instrument in English, which is a PDF format. What I was going to do is just create an Excel document where I can auto populate my data in month over month. Then it'll give me a summary page of what my data is for the year for that time frame, but I didn't know if you guys are requiring us to submit backup to prove our numbers or what.
 1. Answer: There is no requirement to submit backup.
 - a. Question: So, we're just giving you numbers?
 - i. Answer: Yes, we're just entering the numbers into the system. There is in two particular cases, and Andrew you may want to speak to this, in two particular case when you're talking about vehicles, for example, if you have a lot of vehicles there is the capability to upload an Excel spreadsheet, but in general you're entering your information into the online system.
 1. Comment: Right, because we have a quite a bit of ambulances here. And I know, based on those there as far as me getting the mileage, and in the maintenance of those,

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and things of that nature I was trying to create a spreadsheet just for ambulance number one through ambulance number 30. And then what data you were requiring for each of those vehicles so that they can roll, and I can create a spreadsheet where they roll out to give me a summary. I was just trying to look and see how detailed are you into it or I can make sure I'd be just as detailed as well.

- a. Answer: Two quick points on that question. The first one is, we definitely heard from ground ambulance organizations that take the approach that you're planning to: creating an Excel spreadsheet where you're kind of a parking lot for information you're collecting along the way so that it's ready when it comes time to report information. So that's a great strategy. Now we'll stress that it's worth a look through that PDF because it's often the case that there's actually less specificity required to report GADCS than people expect at the start of this process. For instance, you'll never have to report information on individual staff members all aggregated up. There's no reporting monthly, it's just an annual total. So, it's worth taking a look at those tables to, you know, might check a couple things off you maybe assume you need to track but actually don't.
 - i. Question: Okay, because as you mentioned about the staffing my - the paramedics,

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the EMTs and then the supporting staff, which is like the billing department, and dispatch. Now dispatch is included in this data collection am correct? In our department it's our dispatch, our EMS department, which covers both the paramedics and medics for EMS. And then we have some fire medics that respond to some calls as well. But however, we don't bill on the fire medics charts, we only bill on the EMS, that's the paramedics and EMTs. Where would I need to distinguish that at as far as on the labor costs in personnel?

- ii. Answer: Yes, those are great questions. I'd direct you to a couple prior webinars on a general overview of the GADCS and allocation. Those resources are all upon that GADCS website. They're great, all great questions. The short answer is that dispatch is in scope, and so you'd have to find out some way to report an applicable share of dispatch expenses.

- 3. Question: We were selected for, the City of Arcadia Fire Department, for the data collection. And just reading the documents reiterating it says Fiscal Year 2023. I just want to confirm that when you state that you meant July 1, 2022 to June 30, 2023? I just wanted to confirm that's what the document defined that period.

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- a. Answer: I'm not sure exactly what document you're referring to. I don't think there would be a conspicuous mention of Fiscal Year 2023. I think the two dates that stand out in my mind, so organizations that were selected Year 1 and Year 2 need to start their 12-month data collection period some time in 2022. For some organizations that's January 1, for some organizations that's the Fiscal year that starts in 2022. So yes, for some organizations that might be a date that starts October 1, like the last questioner, 2022. So, the actual - the factor that's most important is it's the Fiscal Year that starts in Calendar Year 2022. So, if you call that your Fiscal Year 2023 that's fine. But that would be the start for the 12 month data collection period.
 - i. Comment: Okay, that's what I just want. Yes, because we selected Fiscal Year 2022, 2023 which means the data that I need to collect will be from July 1 to June 30, 2023. I just want to confirm because when - on our end just when I meant the document, I would read the document where it usually say Fiscal Year 2023. From what I'm reading, and from sometimes on our budgetary point of view, when you say 20 - Fiscal Year 2023 that means the year after.

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