

Centers for Medicare & Medicaid Services  
Questions and Answers from  
Open Door Forum: Ambulance  
August 12, 2021

1. How do we find out what year we're in 1, 2 or 3? Is there a list somewhere?
  - a. Yes. The list is up on our Ambulances Services Center website. Year 1 and Year 2 is up. It has been posted.
    - i. What's the website?
      1. Ambulances Services Center website. If you Google "CMS ambulance" that should be your first website that you see.
        - a. So, if my year is '22, so I have to collect all of my information in '22 and report it in '23, correct?
          - i. That's correct. And you can pick a calendar year or you can pick your organization's accounting period. So, it could be a fiscal year beginning in 2022.
            1. The earliest time that the reporting has to be done is a year and a half from now, correct?
              - a. It would be beginning in 2023.
  2. I just wanted clarification on when reporting is due. I think I heard you just say January '23 if you are a Year 1. Is that the end of January?
    - a. It would depend on your data collection period. And so, if your data collection period is a calendar year and it begins January 1, 2022. When your data collection period ends, then that would be December 31, 2022. You have up to five months to report.
      - i. The end of May then would be the five months for a calendar year reporting entity?
        1. That's correct.
  3. We are not getting any correspondence from the CMS EDI Web site for our transmissions. Everything that we have transmitted since 7/16 has been in a pending mode. I have spoken to a couple representatives and I'm just getting a brick wall. I did speak to someone and they did make the statement that there was some type of an edit that was initiated, a Part B/Part A error code. Is there any update on this? Can someone direct us accordingly? Because I'm hearing that other services and not only just Part B organizations for transportation, but any other Part B services experience in the J15 area. And, it's going to start turning into a cash flow issue. Is there a number online, a contact person or is there anything that you know about this situation?
    - a. CMS is in the process of fixing the error and anticipates that the error will be corrected beginning next week. All impacted claims should be reprocessed by August 30.

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4. I'm seeking information that I might be able to - the location of information. The collection of this data is going to be a monumental undertaking for some organizations. And I understand that there's probably a penalty if an organization doesn't comply and provide the information that's being requested. Can somebody direct me to where we could research what the penalty might be for non-compliance in providing the information?
  - a. We would point you to our Ambulances Services Center web site under Spotlights, New Medicare Ground Ambulance Data Collection System. The first bullet provides you our Calendar Year 2020 Physician Fee Schedule Final Rule and where you can read regarding the 10% payment reduction. There's also a hardship exemption provision. So, we would refer you to that regulation. And if you have any additional questions, you can email us at our data collection mailbox. And that's ambulancedatacollection, that's all together, at cms dot hhs dot gov. if you Google "CMS ambulance," it'll be your first listed website. So, if you go down to Spotlights, down to our New Medicare Ground Ambulance Data Collection System, the first bullet will lead you to our final rule and you'll see how we established the Medicare Ground Ambulance Data Collection System. You can also read regarding the comments that we received on this provision and our responses and what we finally decided.
5. My question revolves around staffing and labor costs. We're a fire department-based ground ambulance organization in which I have firefighter EMTs staffing both the fire apparatus and ambulance. I want to know how you want us to separate out the hours staffed on the ambulance versus the fire truck. That's something that we do not track currently. Basically, I could give an estimate. We staff an ambulance 24 hours, 7 days a week, 365 days a year. And we also put on additional ambulances, which wouldn't be hard to track. But as far as each person on those ambulances, that would be extremely hard to track. And the reason I ask this is because firefighters aren't paid the same. So that's where my issue lies.
  - a. A couple of points in response. The first one is that staff members that have both ambulance and public safety responsibilities will be reported as separate categories. So if you have some EMTs and some firefighter/EMTs, they will need to be tallied up and then reported separately. The other part of your question about how to - for those firefighter EMTs - how to separate out hours, and that's an area where CMS is proposing a change. So, we're not able to say much at this point about what it will look like at the end of the PFS rule process. I will say that in the printable instrument as the questions are worded now, the one most important piece of information is total hours. So the total hours combining whatever time they're spending on ambulance or fire combined is the most important number. The part where CMS has proposed some changes and is looking for comments has to do with that split between ambulance versus not. So that's a little in flux right now. But the most important number is to track total hours for the staff who

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have anything to do with ground ambulance. And if that's a number you do track, then that's a good starting point.

- i. Yes. I appreciate that. The total number of hours wouldn't be an issue. It's separating out what hours were worked on what apparatus would be difficult to say at best because, I never know who's going to be on the ambulance from day to day.
    1. Right. That's a good point. We've heard that for different purposes, ambulance organizations use a range of different approaches to try to separate out costs in these dimensions, thinking about the share of fire versus medical responses or other allocation approaches, might be the kind of approach that could work. But there's at this point no specific instruction.
6. I wanted to know where do I go to check to see when we get the notification letter? Because we have had a turnover in staffing and I want to make sure that if it's being emailed, who it is being emailed to or what address was used because our corporate office, our office had moved to a different location per se. So, I mean, we got another office. Our main office is still at one location, but now we got a satellite office. The ground ambulance part is in a different office. So, I just wanted to make sure that based on the slide that you used on Page 10 for notification update that in the fall CMS will send a notification letter to us. And will we get a hard copy from MAC and an email as well? And I just want to make sure the right person receives that information.
  - a. We would suggest that you check PECOS with your NPI number and make sure that information is correct, the contact information is correct because that is the vehicle for which the MACs will send out the notification letters. The contact information that is in PECOS will be used by the MACs to send out the notification letter. So, it's important to make sure that your NPI information is updated.
    - i. Yes. Our NPI number is still the same. I just wanted to make sure if there's a certain person that it was specifically going to. If so, that way I can change the information and get that situated as soon as possible. Some people have retired so.
      1. The list - I'm not sure if this is part of your question, but the lists of the Year 1 and Year 2 sampled organizations are up on the Ambulances Services Center website.
        - a. Yes. I saw where we were listed in Year 1 for us to generate our information. Do you have the PECOS website that I can go on?
          - i. It is on Page 8 of the slide presentation.
  7. I didn't get that information on where to get PECOS. And I went onto your site and I cannot get in NPI see if we're on Year 1 or Year 2.

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- a. If you're not listed, your NPI is not listed under Year 1 or Year 2, that means your NPI has not been selected in Year 1 or Year 2.
    - i. So, we don't have to worry about this right now?
      - 1. That sounds right if you're not an NPI on one of those two lists.
        - a. Okay. And I put it in and did the control ask to try and pull it. I hope I didn't dismiss it. Is there another way to locate it? Those lists are pretty long.
          - i. True. You can also sort the list by organization name or by primary practice locations, state, I believe.
            - 1. Okay. And I did all of that and I couldn't find it. So, I guess we don't have to worry about it for a little while.
              - a. We still would encourage you to listen in to the webinars to get ready, but it sounds like not.
                - i. There are quite a few that are not listed. Is that correct?
                - ii. In each year, approximately 25% of ground ambulance organizations were sampled. Two years out, that's roughly half.
                - iii. Oh, okay. And what time is the webinar on August 26?
                - iv. 2pm EST.
8. When will the portal open where we can start looking at how this data is going to be input? Because like the gentleman said earlier, this is going to be a huge undertaking.
  - a. Are you referring to the Web-based system update?
    - i. No. I'm referring to the reporting portal that we're going to input this data in. When will we have login information and be able to access that?
      - 1. That is the Web-based system update and that will launch prior to the start of the first data reporting period in 2023.
        - a. We won't be able to see that prior to 2023?
          - i. The reporting system, no. It is currently under development. You can use the printable version of the instrument.
          - ii. Secondly, will there be a like a helpline we can call to get guidance on things or are we going to have to strictly rely on email or webinars?

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1. It is anticipated there will be a help desk once you enter into the Web-Based system if there are issues. And as I stated earlier, we're going to provide some training and providing instructions on how to create accounts and access the system. And if you have subsequent issues, you can always email us at our ambulance data collection mailbox. And we will have different vehicles to assist you with reporting.
  - a. Just to highlight two more resources. The FAQ document that's up on the Ambulances Services Center website is packed at this point with some frequently asked questions. So that's a great resource to go first if you have a specific scenario that, you know, might seem like a unique scenario or some special consideration for how you report for your organization. At this point given we've already received questions from quite a few organizations, there's a pretty good chance that someone has asked a similar question. So that FAQ document is great to review as a first resource to go to. The second thing I didn't mention in between the webinars, the RAND crew is going to host some live Q&A sessions that will be a combination of Web and phone-based but it will be available during those sessions to respond to your questions live, which will give a little more time than we have in the brief Q&A sessions after these webinars. They'll be in between the webinars will be these regularly scheduled Q&A sessions where we

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would be happy to tackle any questions.

- i. They'll be in between the webinars will be these regularly scheduled Q&A sessions where we would be happy to tackle any questions.
- ii. I believe the dates will be posted up on the Ambulances Services Center website soon.
- iii. One final thing and I'm going to stop. She was referring to a hard copy of the data, is that on the website as well, I mean?
- iv. Yes. The printable version of the instrument is up on our website. It's under Spotlights, New Medicare Ground Ambulance Data Collection System. And it is the third bullet.
- v. Just one more thought in response to that question. The printable instrument has instructions in it to deal with all of the different scenarios we've talked about briefly today, providers, fire-based, other public safety-based, EMS-only organizations, volunteer versus not, et cetera.
- vi. The instructions are on the long side because of that. And that's something that - you know, it is a little trickier to read through the program instrument compared to what you'll ultimately use in the

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- program instrument to report information.
- vii. So just as you're looking at that printable instrument, just keep in mind that not all of the text and not all of the questions will apply to your organization. And there are some annotations that you can use to follow along. But there's a limit to how much you can replicate a Web-based survey in PDF.
9. I just had a quick question in regards to the survey. You mentioned inter-facility transports that were to and from a hospital or other provider. Is CMS also including skilled nursing facilities and assisted living facilities in that broad term of inter-facility transport?
- a. We are using CMS' definition of inter-facility transports. And that can be found in our Medicare Benefit Policy Manual, Chapter 10. We're using that definition. Actually, that's our definition for specialty care transports, inter-facility transportation, one in which the origin destination is one of the following: a hospital or SNF that participate in a Medicare program or a hospital-based facility that meets Medicare requirements for provider based status.
10. We are in the second-year reporting group and our department would like to do a fiscal year reporting time frame for our 12 months. Would we be able to start October of '22 to September of '23? Would that fit within the timeline and then report five months after September of 2023?
- a. That is an acceptable data collection period. Yes. The fiscal year, would have to start in 2022. You know, we would know that, you know, some of them wouldn't start in January. So that timeline that you provided is acceptable.
11. When this first came out with this collection thing, we were asked to do it first, like a test type thing. And then the corona hit and I was supposed to report, I'm going to say 2020 and then have my data sent to you in 2021, five months, and then I saw something where that was canceled because of COVID. Is that correct?
- a. That's correct. You would need to establish new data collection period beginning in 2022.
12. Since your portal is not going to be for this print - the portal will not be up and running until sometime in 2023, would it be smarter for me to use my fiscal year? Or can I - so I can get in on having a portal?
- a. The printable instrument is available. It's the reporting system that won't be available. The determination of your data collection period would be based on

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your organization's accounting period, whatever your preference would be for a calendar year.

i. Who do I need to know my new dates that I'm going to do because I am in the one?

1. You will receive, and hopefully you received the first notification letter, you will be receiving another notification letter from your MAC. And please follow the instructions to provide your new start date of your data collection period, as well as contact information.

a. This printable version, can you give me that website again where I can find this?

i. It's on our Ambulance's Services Center website. And if you Google "CMS ambulance", that's the first website listed. And once you go on our website, instrument is under Spotlights. It's under the Medicare Ground Ambulance Data Collection System.

13. When we first received the information from our MAC, there were instructions that we were to send notification to the MAC to identify what our actual collection period was going to be. Every time we got the update on the waiver, I continued to send an update to my MAC. To date I have never received a confirmation that they either have acknowledged or confirm receipt. I, of course, have kept receipt copies. But just to clarify, is the MAC supposed to be confirming for me that I had sent an email saying that our report dating is October 1, 2022 through September 30, 2023 and we will begin submitting data no later than February 29, 2024?

a. The MACs will be sending out another notification letter. We're kind of like starting over with that process with Year 1 reporting their start date of their data collection period. So, stay tuned to receive that letter and please follow those instructions.

i. With the waiver, we've also begun a hospital at your home program that is staffed with community paramedics. When we're reporting time transport expenditures if there's not an actual physical transport, but there is a rapid response where we go to the patient's home that is considered inpatient, will there be instructions in this new - or how will we be responsible to report the hospital at your home data? Has that been brought up at this point yet?

1. There are specific questions in the instrument asking for revenue for various types of services that aren't transports. This feels like a specific question that would probably be best fleshed out in an FAQ so others can benefit from the information once it's available. So just to point that there are some questions that could be compatible with putting that type of information. There are no

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instructions in the version that's up on the website right now, which was last updated just prior to the start of the pandemic, I think. There are no instructions up there right now on how to handle that situation.

- a. So, is that something that I need to submit as a question or is that something that you guys will take note of and add to the fact report later?
  - b. There are specific questions in Section 13 of the Instrument asking for revenue for health care services other than transports. Please check future additions to the FAQ for more information.
- 14. Just to make sure that I understood correctly, we are on Year 2 organizations. The collection information starts on 2022 if it's from January. And then we have five months after 2022 to submit. In other words, we have five months to submit all that information on 2023. Is that correct?
  - a. You have up to five months to report your data after your data collection period ends. Whenever your data collection period ends, your data reporting period, you have to report - you have up to five months to report that information.
    - i. Up to five months. Okay. Also, you have indicated that for Year 2 organizations, there's going to be the initial notification letters send out in the fall. By any chance, do you know what month they're going to be sending those out?
      - 1. We hope to start in the fall, in the fall meaning October.
- 15. You had mentioned registering for the August 26 webinar and I do not see a place to do that.
  - a. That information hasn't been posted on our website yet, but please stay tuned. We hope to post as soon as we can.
    - i. I should see it under the Ambulances Services Center under the Webinars section then is where I would be looking for it at?
      - 1. Yes.

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