

Submitter :  Date & Time:

Organization :

Category :

**Issue Areas/Comments**

**Issues**

Background

test

CMS-1492-IFC-2

Submitter : Ms. Karen Endicott-Coyan Date & Time: 08/11/2004 03:08:02

Organization : Mercy Health System of Kansas, inc.

Category : Hospital

Issue Areas/Comments

GENERAL

GENERAL

August 11, 2004

Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Attention: CMS-1492-IFC  
P O Box 8011  
Baltimore, MD 21244-8011

RE: CMS-1492-IFC

The Medicare, Medicaid and SCHIP Benefits Improvement and Protection Act of 2000, section 221 required a study of the costs of providing ambulance services for trips originating in rural areas. The results of the prescribed study were published in GAO-03-986. GAO recommended that the Administrator of CMS better target the rural payment adjustment for trips provided in ?rural counties? with particularly low population density by adjusting the base rates.

Medlearn Matters Number: MM3099 indicates the increase in payment for certain rural ground ambulance transports applies when the point of pickup is in a ?rural county? that is comprised by the lowest quartile by population of all such rural areas arrayed by population density. It further states that these rural areas are identified by a zip code with a ?B? indicator on the national zip code file.

The utilization of zip codes to determine the ?rural county? designation will exclude a portion of the ambulance trips which originate in the same rural county.

Bourbon County, Kansas is designated as a ?rural county? ranking in the lowest quartile by population. The national zip code file lists the following Bourbon County, Kansas zip codes, with a ?B? indicator:

- 66010 ? Blue Mound
- 66701 ? Fort Scott
- 66716 ? Bronson
- 66738 ? Fulton
- 66741 ? Garland
- 66754 ? Mapleton
- 66769 ? Redfield
- 66779 ? Uniontown

However, citizens living within the boundaries of Bourbon County also have the following zip codes:

- 66711 ? Arcadia
- 66746 ? Hepler
- 66755 ? Moran
- 66772 ? Savonburg
- 66780 ? Walnut

These zip codes are not identified with a ?B? indicator on the national zip code file. Therefore, a portion of the ambulance services provided by Mercy Health System of Kansas, Inc., within the boundaries of Bourbon County, will not receive the super-rural bonus payment as provided in the July 1, 2004 Federal Register.

**CMS-1492-IFC-2**

Federal Register Vol. 69, No. 126, Thursday, July 1, 2004 page 40289 clearly states "the payment for the ground ambulance base rate is increased where the ambulance transport originates in a rural area included in those areas comprising the lowest 25th percentile of all rural populations arrayed by population density." The utilization of zip codes to determine which ambulance transports qualify for additional payment is in direct contradiction of the language published in the federal register.

CMS should implement the increase on a provider specific basis. CMS has data available which indicates the county where each ambulance provider is based. I recommend CMS provide the additional payment to those specific providers located in a "rural county" that is comprised by the lowest quartile by population of all such rural areas arrayed by population density.

I would urge CMS to reconsider the utilization of zip codes to determine which ambulance trips receive the super-rural bonus payment.

Sincerely,

Karen Endicott-Coyan  
Director Revenue Management  
Mercy Health System of Kansas, Inc.  
401 Woodland Hills Blvd.  
Fort Scott, Kansas 66701  
620-223-8025

Submitter : Mrs. Jo-Anne Cooper Date & Time: 08/25/2004 03:08:09

Organization : NOT APPLICABLE

Category : Individual

Issue Areas/Comments

**GENERAL**

GENERAL

I personally feel that physicians should have the right and ability to choose what medical professional is best suited to fill his patients needs. Do not feel that one group has the right to exclude any other and the matter should not be left up to them.

Submitter :  Date & Time:

Organization :

Category :

Issue Areas/Comments

**GENERAL**

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