

Centers for Medicare & Medicaid Services  
Questions and Answers  
Open Door Forum: Ambulance  
Thursday, July 27, 2023

1. Question: Is it possible to have more than one in the submitter role on the portal?
  - a. Answer: You can register more than one user and then assign them to the same NPI to serve in the submitter role.
    - i. Question: Okay, to clarify, I think what I heard before about the person that verifies or certifies that has to be somebody different than the submitter. Is that correct?
      1. Answer: For most organizations, it will be someone different, like a CEO, Fire Chief, or someone else with signing authority for the organization, which the data submitters may not have. There are some very small organizations where there may be one person wearing many, many hats, and in that situation, there are ways for the same person to remove the submitter role from their account, add the certifier role, and play both roles, but you can't have both roles at the same time.
2. Question: Could you repeat the 2% for the urban increase that was extended to what date?
  - a. Answer: The three temporary add-on payments have been extended through December 31, 2024.
3. Question: We are in the 2023 data collection, and with beneficiaries that have a Medicare replacement policy, should they go under the Medicare case mix, or should we define them under our commercial or the other umbrella that they would go under? It's going to be a little ambiguous to keep apples to apples, but if it was a conditional Medicare Part B patient, I'm assuming that is what we would want to report, and the others would go as a six-figure, is that correct?
  - a. Question back to participant: Are you referring to like a Medicare Advantage, or like a Managed Care kind of situation or something else?
    - i. Answer to CMS: Yes. These people that have these replacement policies, Medicare Advantage, Humana Gold, there's a laundry list of them, and in our geographic area, we see a lot of that. Our case mix, I want to be precise upon reporting. I break that down, and if I need to make a correction or adjust an entry, I want to get out in front of that.
      1. Answer to participant: I break everything down accordingly. I can highlight it. Again, I haven't looked at this input section yet. I have

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all my data being collected and bringing it forward. I guess the only other question that I would have, and I picked up on this, is that we are a for-profit small service, and we do about 5,000 runs per annual. I am the CFO, so I'm also the data collector plus the submitter, plus the certifier. So, what hoops do I need to jump through, or do I need to get another person involved in this? I have some help with the data collection part of it, but I'm pretty much wearing all three hats. Page 130 on the User Guide is where the step-by-step instructions for the certifier begin. Talking about how to switch from a submitter to a certifier, and it's a little bit different. You can ask for both roles. Once you're ready to certify, you're going to remove that submitter role, it will leave you with your certifier role, and you're good to go. You'll submit your data first, then go in and request the other role, and then go in and certify your data.

2. Comment from participant: Okay, I understand. Like when I'm in data collection, I've got this because I'm trying to make it efficient as I can, and because of all the other things, and I have the data after. I just need to know where to pull it from.
4. Question: I work for a hospital-based organization in California, and I'm a little bit new to the process. Our collection period just began on July 1; our fiscal year runs from July to the end of June. I want to make sure I understood the timeline. We don't report any of the main data until the end of the collection period, the five months after the 12 months. Is that correct?
  - a. Answer: That's correct. So, if you just started, you will have until the end of November, and that's the end of your five-month period in 2024.
    - i. Question: Okay, is there anything I should be doing until then? I noticed one of the graphics said there was some other information that needed to be entered. Does that need to be entered before that five-month window? I think the organizational characteristics, the service area, the emergency response time, or can that wait?
      1. Answer: That's a good question. That specific information does not need to be entered ahead of time. That's just when you do get in 2024 when you do get to actual reporting that's what you have to report first before you can move on. What is due is a very brief web survey to provide CMS with some initial information, basically, contact information, and then your data collection period start date. So, suppose your organization hasn't done that already. In that case, there's a Palmetto GBA, one of CMS' MACs,

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(Medicare Administrative Contractors). They host a web forum that lets you enter that information, and it would probably take you three minutes to do it. That was due 30 days after the receipt of the notification letters.

5. Question: We have two NPIs, one that we do primary billing and the other one for Medicaid specifically. Are we going to have to do two different reports, and how would we report that?
  - a. Question back to participant: That's a great question. Was the Medicaid NPI selected to participate in the GADCS?
    - i. Answer: We were trying to get all of our data and figure out how we were going to pull all of our information, and with the two NPIs, I'm trying to figure out which one was selected or if they were both selected.
      1. Answer: If you Google CMS GADCS, you'll get to the GADCS website. On that website, there's a list of Year 1, Year 2, Year 3, and Year 4 organizations that have been selected for the GADCS. You can look for the NPIs there. If it's not on one of those lists, that NPI has not been selected, and you don't need to submit any information for that NPI. The sampling for the GADCS is based on Medicare claims from a prior 12-month period, so if that Medicaid NPI was never used to bill Medicare for ground ambulance services, then there's no way it could have been selected for the GADCS. We hear from a lot of organizations who think that their NPI has never been used to bill Medicare for ground ambulance services, but somehow one or two sneaks into the Medicare claims, so I would double-check to make sure that Medicaid NPI is not on one of those four lists.

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