



Ground Ambulance & Patient Billing Advisory Committee

Legislative and Regulatory Solutions to Prevent Balance Billing

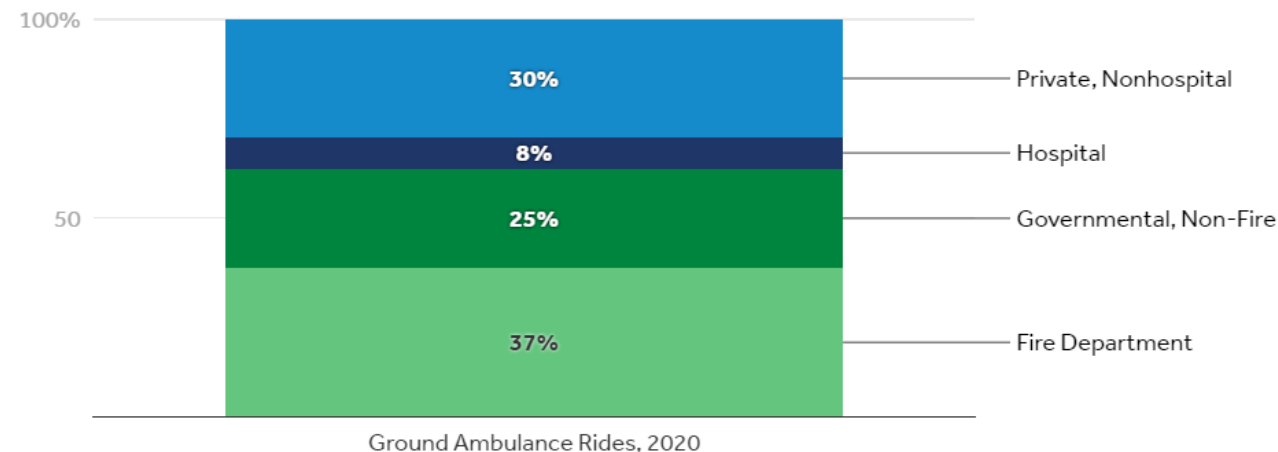


Adam Beck

The Challenge

- Ground ambulances bring 3 million privately insured people to an emergency room each year.
- About 10% of arrivals to emergency departments are via ambulance.
- About half (51%) of emergency and 39% of non-emergency ground ambulance rides included an out-of-network charge for ambulance-related services that may put privately insured patients at risk of getting a surprise bill.
- According to the Kaiser Family Foundation, the costs for an average ground transportation trip amounts to about \$450.

Share of emergency ground ambulance rides, by organization type, 2020



Potential Solutions

Federal Legislative

Prohibit Balance Billing by
Ground Ambulance Service
Providers With No
Reimbursement Standard

Federal Legislative Benchmark

- Median Contracted Rates
- Public Program Standard
- 3rd Party Database
- Usual and Customary

Extend *No Surprises Act* QPA
and IDR Structure to Ground
Ambulance Claims

- Federalism concerns and
regulation of state and local
government entities

Federal Regulatory

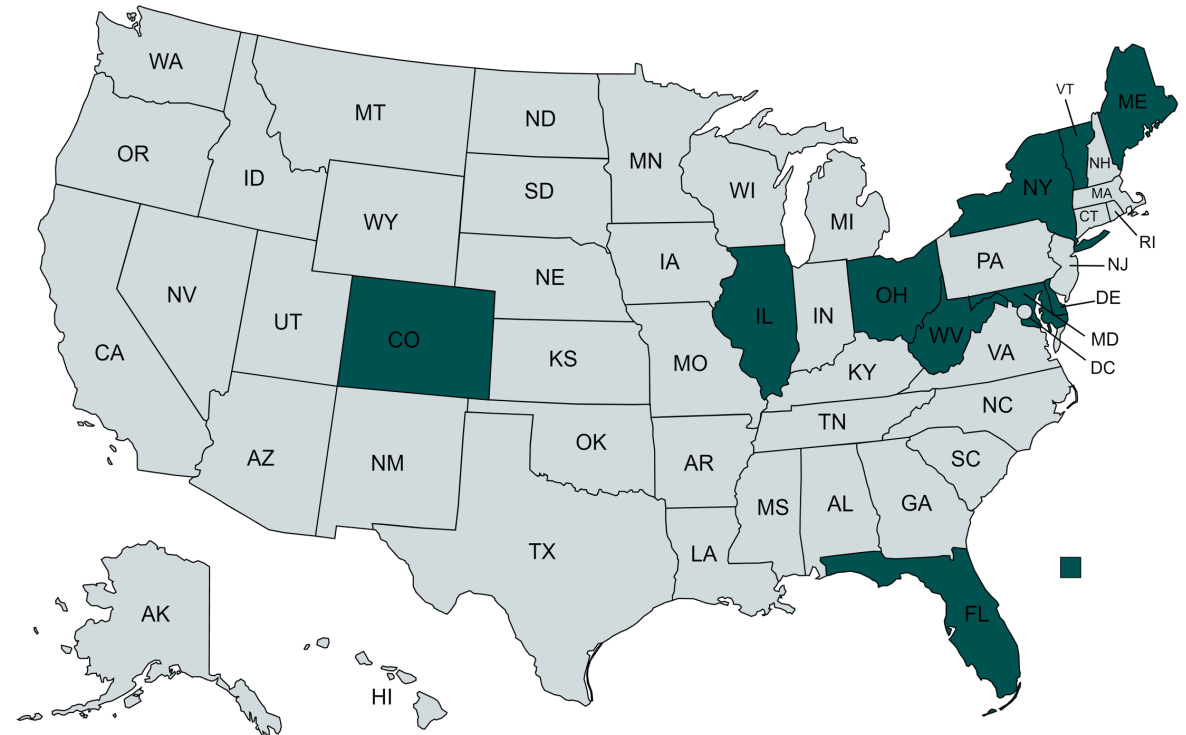
Options are quite limited as ambulance
providers and EMTs are generally not
Participating Providers under the Social
Security Act

Other Federal Considerations

- **Medicare Payment Rate Review** – This ongoing rate review has the potential to impact ambulance cost and surprise/balance billing. The government is collecting detailed data from ambulance companies and the related costs for operating ground ambulances. This updated data set will be used to help CMS decide whether to update the ground ambulance payment rates, which have not changed since 2002. If these rates are increased, it may result in more ground ambulance providers entering contracts with issuers and reduce the frequency of surprise bills.
- Medicare currently pays set prices for ambulance rides, a base rate of roughly \$225 for the usual care + a mileage fee. It also forbids companies to send patients additional bills.

State Solutions for Prohibiting Balance Billing – Ground Ambulance Transportation

- 10 States have some legal protections for consumers from ground ambulance balance billing:
 - Colorado
 - Delaware
 - Illinois
 - Maine
 - Maryland
 - New York
 - Ohio
 - Florida
 - Vermont
 - West Virginia



State Approaches Vary

- 8 states protect consumers from balance bills for ground ambulance transport
- 2 states protect consumers from balance bills only for emergency services
- 6 states regulate reimbursement rates for OON ambulance providers
 - 5 base reimbursements on provider billed charges or a “usual and customary amount” – keeping costs high.
 - Colorado reimburses at 325% of Medicare
- 8 states apply regulations to both public & private ambulance providers
 - 1 applies only to private
 - 1 applies only to public

