Medicare Ground Ambulance Data Collection System (GADCS):
Changes Finalized in the CY 2024 Physician Fee Schedule Final Rule

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Agenda

Today's presentation includes three parts:

1. A summary of GADCS-related finalized changes in the Calendar Year (CY) 2024 Physician Fee Schedule (PFS) Final Rule.
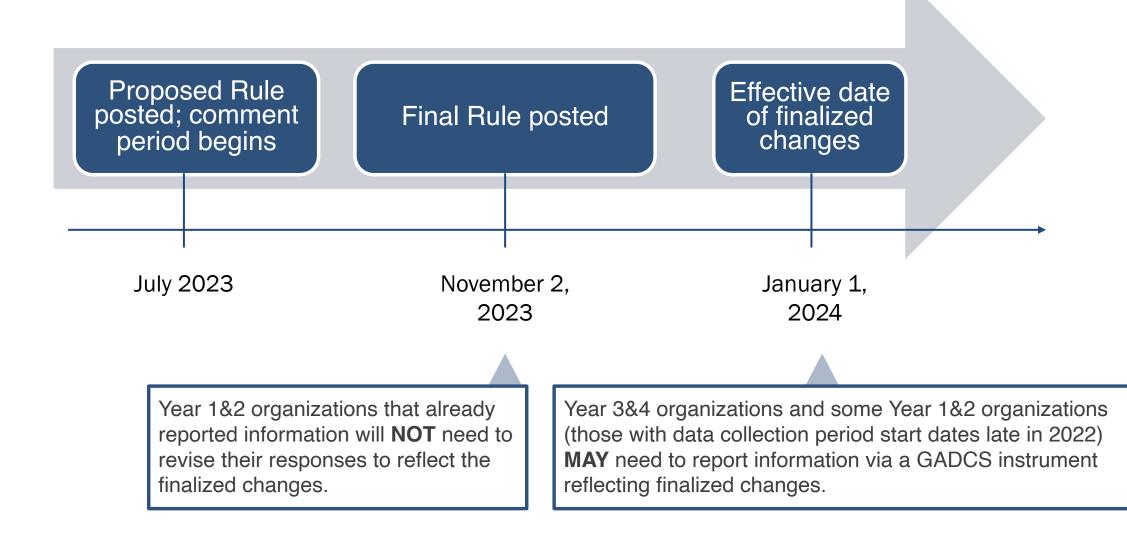
You can access the CY 2024 PFS Final Rule here (page 1443): https://www.federalregister.gov/public-inspection/2023-24184/medicare-and-medicaid-programs-calendar-year-2024-payment-policies-under-the-physician-fee-schedule.

2. A brief GADCS overview.
3. An overview of GADCS resources.

1. Summary of GADCS-related Finalized Changes in the CY 2024 PFS Final Rule

Timeline for finalized CY 2024 changes

Proposed Rule posted; comment period begins	Final Rule posted	Effective date of finalized changes
July 2023	November 2, 2023	January 1, 2024

Year 1&2 organizations that already reported information will **NOT** need to revise their responses to reflect the finalized changes.

Year 3&4 organizations and some Year 1&2 organizations (those with data collection period start dates late in 2022) **MAY** need to report information via a GADCS instrument reflecting finalized changes.

Addressing partial-year responses

Currently:

- Section 2, Question 1: Is [pre-populate number] an NPI your organization used to bill Medicare for ground ambulance services during the data collection period? Yes / No

CY 2024 PFS Final Rule Change:

- Split the existing "Yes" response into two separate responses:
  - "Yes, throughout the organization's continuous, 12-month data collection period."
  - "Yes, but for only part of the organization's continuous, 12-month data collection period."
  - "No" response will remain as-is.

Programming logic for hospitals and other Medicare providers of services

Currently:

- NPIs that indicate "yes" to any of the following questions in Section 2 (Organizational Characteristics) will see questions in Section 7 (Labor Costs) about fire, police or public safety labor costs
  - Question 7: Fire department-based, police or other public safety department-based <u>OR</u>
  - Question 8: Shared some or all costs <u>OR</u>
  - Question 9 = fire, police, or other public safety department
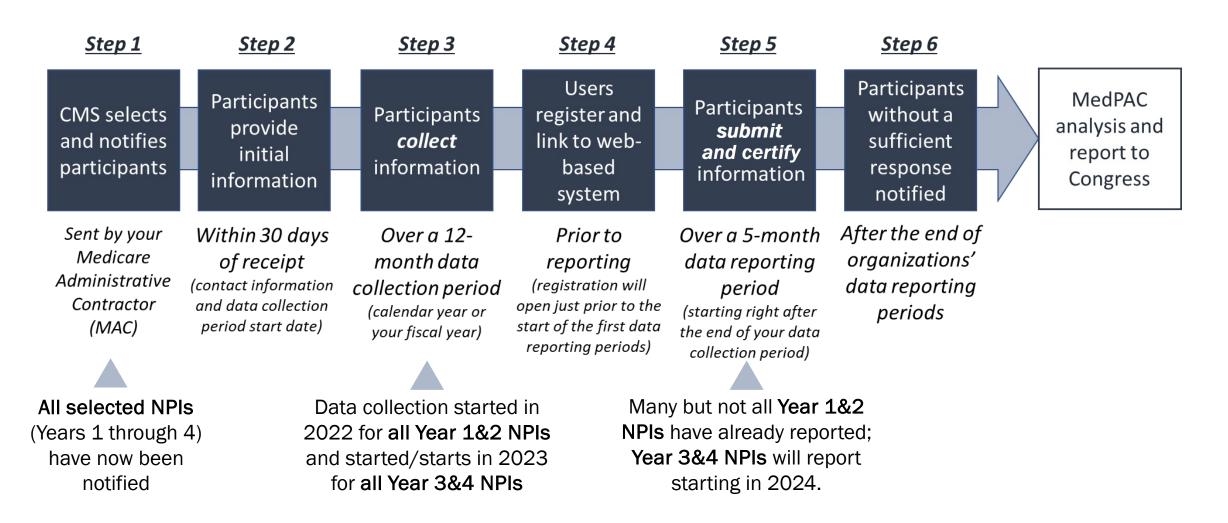
CY 2024 PFS Final Rule Change:

- Only NPIs that report "yes" to <u>ALL</u> the fire, police or other public safety options in Section 2 will see questions in Section 7 (Labor) about fire, police or public safety labor costs.
- Ensures hospital-based NPIs will <u>NOT</u> see questions about fire, police or other public safety in later sections of the GADCS.

Other finalized editorial changes and technical corrections

- Updating Section 2, Question 3 (organization name) in the printable instrument so that it aligns with the functionality now in the web-based GADCS.

- Section 9.1 and Section 9.2, Question 5:

  – Update fixes incorrect language about acquisition costs and annual depreciation

    - Current: "Do not report ground ambulance acquisition costs related to an annual depreciation expense"

    - Changed: "Do not report an acquisition cost and an annual depreciation expense for the same ground ambulance."

- Correcting typos that do not affect the meaning of questions (e.g., punctuation correction).

2. Brief GADCS Overview

What's the process for GADCS?

Step 1 — CMS selects and notifies participants

Step 2 — Participants provide initial information

Step 3 — Participants *collect* information

Step 4 — Users register and link to web-based system

Step 5 — Participants *submit and certify* information

Step 6 — Participants without a sufficient response notified

MedPAC analysis and report to Congress

Sent by your Medicare Administrative Contractor (MAC)

Within 30 days of receipt (contact information and data collection period start date)

Over a 12-month data collection period (calendar year or your fiscal year)

Prior to reporting (registration will open just prior to the start of the first data reporting periods)

Over a 5-month data reporting period (starting right after the end of your data collection period)

After the end of organizations' data reporting periods

All selected NPIs (Years 1 through 4) have now been notified

Data collection started in 2022 for **all Year 1&2 NPIs** and started/starts in 2023 for **all Year 3&4 NPIs**

Many but not all **Year 1&2 NPIs** have already reported; **Year 3&4 NPIs** will report starting in 2024.

3. Overview of GADCS Resources

Resources

- Access the most up-to-date printable instrument (in English and Spanish, with a change log vs. earlier versions), the GADCS User Guide, and a frequently asked questions (FAQ) document on the CMS GADCS website:

  https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/AmbulanceFeeSchedule/Ground-Ambulance-Services-Data-Collection-System

- View the new GADCS walkthrough video here: https://youtu.be/hSf8YIOWSys
- Past slide presentations, webinar recordings, and supplemental documents are also on this site.
  - The GADCS printable instrument (English version), and FAQ have been updated to include changes in the CY 2024 Physician Fee Schedule Final Rule and are posted on our GADCS website. The GADCS User Guide is being updated and will be posted as soon as possible.
  - Please note that some other resources posted on CMS' GADCS website **have not** been updated to reflect the changes finalized in recent years of rulemaking.
- If you have additional questions, please contact: AmbulanceDataCollection@cms.hhs.gov

Medicare Ground Ambulance Data Collection System (GADCS): Most Common Questions

Note: You can find a GADCS User Guide, FAQ, other resources on CMS' GADCS webpage:
https://www.cms.gov/medicare/payment/fee-schedules/ambulance/medicare-ground-ambulance-data-collection-system
Watch the new GADCS walkthrough video here: **https://youtu.be/hSf8YlOWSys**

Question	Answer
1. Why is CMS collecting this data?	1. CMS is required by statute to collect this data. It will be analyzed by MedPAC to inform recommendations on Medicare payment rates for ground ambulance services.
2. Has my organization been selected to participate?	2. Lists of selected organizations are at the website above. Year 1 and 2 organizations have already begun to collect and report data. Most Year 3 and 4 organizations are collecting data now and will report data starting in 2024.
3. Is participation required?	3. Yes. Organizations that do not sufficiently submit data will receive a 10% Medicare Part B payment reduction.
4. When will we need to collect and report data?	4. The FAQ at the website above includes examples. Organizations *collect* data over a 12-month period and have 5 months to *report* data after the data collection period has ended.
5. How do I inform CMS of our data collection start date?	5. Report or revise your initial information, including your data collection period start date and contact information, at Palmetto GBA's website: https://www.palmettogba.com/palmetto/gambulance.nsf/. All Year 1 through 4 organizations should have done this by now: If your organization hasn't, please do so immediately.
6. How do we report data?	6. All selected organizations must submit data via CMS's web-based GADCS portal. See the "Quick Tips" guide on accessing the system here: https://www.cms.gov/files/document/quick-tips-registration-and-requesting-access-gadcs-portal-revised-10/06/2023.pdf. Also see the GADCS User Guide on the GADCS website.