

Centers for Medicare & Medicaid Services
Ambulance Open Door Forum
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Webinar recording:

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Jill Darling: Good morning and good afternoon, everyone. My name is Jill Darling, and I am in the CMS Office of Communications, and welcome to today's Ambulance Open Door Forum. Before we begin with our agenda, I have a few announcements. This webinar is being recorded. The recording and transcript will be available on the CMS Open Door Forum Podcast and Transcript webpage. That link is on the agenda that was sent out, and I will also put it in the chat for anyone. If you are a member of the press, refrain from asking questions during the webinar. If you do have questions, please email press@cms.hhs.gov. All participants are muted upon entry. For those who need closed captioning, a link was provided, and I can provide it again. It will be located in the chat function of the webinar. Today, we have the agenda slide, and we will have presentation slides as well. We will take questions at the end of the agenda today. We note that we will be presenting and answering questions on the topics listed on the agenda today for the Ambulance Open Door Forum. We ask that the live questions relate to the topics presented, and if you do have any questions unrelated to these agenda items, we may not have the appropriate person on the call to answer your questions. As such, we ask that you send any of your unrelated questions to the appropriate policy inbox where we can send to Ambulance ODF resource mailbox, which I will supply, and we will try to get your answer to the appropriate component for a response. So, during the Q&A, we ask that you use the raise hand feature at the bottom of your screen, and we will call on you when it is time for Q&A. When the moderator says your name, please unmute yourself on your end to ask your question and one follow-up question. We will do our best to get to all your questions today. Now, I will turn the call over to Ariel Winter.

Ariel Winter: Good morning and good afternoon to everyone. On behalf of the Centers for Medicare and Medicaid Services, we would like to welcome you to the CMS Ambulance Open Door Forum, which we abbreviate as ODF. My name is Ariel Winter, Deputy Director of the Division of Data Analysis and Market Based Pricing. I am the chairperson for today's Ambulance ODF, standing in for Maria Durham. Our division is responsible for coverage and payment policy under the Ambulance Fee Schedule and the Medicare Ground Ambulance Data Collection System, also called Medicare GADCS. As many of you are aware, selected ground ambulance organizations are required by law to report costs, revenue, utilization, and other information to CMS through our GADCS portal. The portal is the online web-based system that you use to report your data. Briefly, we would like to discuss selected organizations in year one and year two that were required to begin their 12-month data collection period in 2022 and report their data to the GADCS portal beginning this year. As of this month, almost 1,000 year one and year two organizations have not started to report their data to the portal. CMS recently emailed

reminder letters and sent emails to organizations that reported the January 1, 2022, data collection start date because they should have completed reporting by now. If you are one of those organizations, it is very important that you report your data. CMS will be conducting additional outreach to selected year one and year two organizations that have not yet reported their data. Selected organizations in year three and year four will be required to begin a 12-month data collection period in 2023 and will begin to report their data in 2024. CMS has mailed notification letters and sent emails to selected organizations in year three and year four that have not yet submitted their initial data, including the start date for their data collection period and their contact information.

Lastly, I suggest that you view the CMS GADCS website and our new GADCS walkthrough video. There are many resources on our website, including the printable version of the GADCS instrument in both English and Spanish, FAQs, GADCS user guide, tip sheets, and prior reporting. In particular, the GADCS video is a fantastic tool to help you and your organization navigate your way through the GADCS. Today, we have a full hour dedicated to the following two topics. First, an overview of the Medicare GADCS changes that were finalized in the CY 2024 Physician Fee Schedule final rule. And second, an update on ambulance inflation factor for CY 2024 and the productivity adjustment. We will conclude with an open Question and Answer session. Thank you all for taking the time out of your busy schedules to join us today. Now, I will turn it over to the moderator, Jill Darling from CMS's Office of Communications, to kick off today's ambulance ODF.

Jill Darling: Thank you so much—first off, we have Andrew Mulcahy.

Andrew Mulcahy: Thanks very much, Ariel and Jill. Give me one second while I get the slides up here. It's a pleasure to be back to the ODF to present an update of changes to GADCS that CMS finalized as part of Calendar Year 2024 Physician Fee Schedule final rule. For longtime ODF attendees, we recently did—a couple months ago—a presentation on the proposed rules in prior years. We have also highlighted the proposed and later finalized changes through the rulemaking cycle kind of presentations, a way to highlight in on specific things that may have been tweaked since you've last looked at the printable instrument or you've last been in the GADCS. We will talk a little more later about how these changes through this year's Physician Fee Schedule final rule affects organizations as they are navigating the GADCS reporting requirements now.

Today's presentation is relatively brief, and I think it will leave much time for Q&A. It covers three parts. First is the summary of GADCS-related finalized changes in the CY 2024 Physician Fee Schedule final rule. We also have a very brief GADCS overview, and to complement that overview, I'll point out a few of the same GADCS resources that Ariel mentioned in those introductory comments. I want to point out in this blue box in the middle of the screen, if you'd like to flip through the actual text of the changes I'll be summarizing today during the presentation, you can click on this link. The page number link page here, page 1443, is for the display copy of the rule. CY 2024 PFS final rule has since published on November 16, 2023. If you would like to find the GADCS changes there, it's way down on page number 79293.

We will go through the summary for those of you on the prior ODF session that went over the proposed changes. You will notice a lot of similarities between the slides I'll put up now and what we went through before. I will walk through each relatively briefly, in terms of an overall sense of how these finalized Calendar Year 2024 changes affect year one, year two, year three, and year four organizations, a couple of guideposts to keep in mind here. The final rule went up in November of 2023. We have an effective date of the finalized changes come January 1, 2024. So, a couple of things to note here, if you are year one or a year two organization and you have already completed your GADCS reporting requirement, then you don't have to do anything to deal with the changes that are coming into effect in January 1, 2024. Your submitted and certified responses will be considered complete and there is no need to go back and make any changes. If, however, you are going to start reporting come January 1, 2024—so that includes all year three organizations, all year four organizations, and a small number of year one and year two organizations that have very late data collection start periods—and you are starting a new submission in the system, then, you will see questions that reflect the changes that I will highlight on the screen in just a minute. Just to reemphasize that point, if you are in year one or year two and you have already submitted and certified, there is nothing more to do on your end. If you are about to start reporting, which about half of ground ambulance organizations that bill Medicare are about to do come January 1, then you will see questions in the online GADCS system that have the changes that I am about to walk through in them. You should note that the changes that CMS did propose and then later finalized through this rulemaking round aim to address a couple of issues brought to CMS's attention through the mailbox or through sessions like this one. Mostly, the purpose here is to clarify and to allow organizations to respond to GADCS questions in a way that is least burdensome and clear for those filling out the instruments.

The first example is a great one of one of those changes where the old question that was in the prior year before the change was finalized. The question asked whether the NPI listed on the screen was the NPI that your organization used to bill Medicare for ground ambulance services during the data collection period. While CMS fielded questions from ground ambulance organizations asking what to do if the NPI was used for only part of the continuous 12-month data collection period rather than just the full 12-month continuous period. So, the change here that CMS proposed and later finalized is to add a response option to Section 2, Question 1. So, the new options appear down below; it splits up the “Yes, we use this NPI to bill for Medicare ground ambulance services,” it splits it up into two parts. One for throughout the entire continuous 12-month collection period. And one for only part of the continuous 12-month data collection period. If you select part, it will then ask you for the applicable dates so you can report to CMS that the information you will be entering throughout the 13 sections of the GADCS is not over a full 12-month period but only part of that 12-month period.

Here is another good example of a clarification that CMS hopes will cut down the burden on users of the GADCS. There is a set of questions in Section 2, which gets at organizational characteristics that try to hone in on the type of organization that GADCS respondents view their organization to be. It's a set of interconnected questions, including Questions 7, 8, and 9. Question 7 asks whether, at a high level, you consider your organization to be fire department-based, police- or other public safety department-based; that's one option. There are many other options, including a hospital or Medicare provider service based, proprietary, etc. Questions 8

and 9 aim to get at whether or not your organization also performs functions other than providing ground ambulance services, whether or not your organization shares costs or has some shared expenses or revenue that span both the ground ambulance operation and some other service, like a fire department or a Medicare provider of services. The way the programming worked under the hood in GADCS previously could result in some situations for organizations that said they were hospital-based or other Medicare provider of service based to see later questions downstream in the GADCS asking about fire, police, and other public safety labor. I guess it is possible, but it is very rare to think about a case where you'd have a hospital, fire department, and an ambulance organization all operating as one entity. So, there are some under-the-hood changes that don't actually result in any changes to the questions but will prevent cases where hospitals were previously seeing some potentially confusing questions asking about labor and other expenses related to fire, police, and other public safety activities which were not relevant to that organization. So that is a great example of a clarification under the hood to try to decrease burden and make it clear what information ground ambulance organizations need to submit via the GADCS.

This slide summarizes a set of editorial changes and technical corrections. Some of these have to do with bringing the programmed instrument and the printable instrument, which is a PDF, I'll put a link up for it in a minute; the PDF is a list of all of the questions and instructions, bringing that web based GADCS and the printable instrument more in alignment. There was originally, there was a question in the PDF version that you could print out that asked what your organization's name was. Well, given the way that CMS developed the system, your organization name is already in the system because it's linked to your NPI, and so the wording of that question changed slightly in the printable instrument to be sure that it aligns with how things actually appear on the screen when you're go through the GADCS in the web-based form. There are a couple of typos, and here's one as an example under Section 9.1 and Section 9.2 Question 5 heading where there are extra words that we took out, a couple of other punctuation corrections, and formatting changes for consistency. So, in terms of the number and scope of changes finalized in this round of PFS rulemaking, there are very few compared to prior rounds. Thanks to all the feedback from the ground ambulance organizations and other stakeholders Medicare in years past already heard, and then acting on that input implemented a set of clarifications and refinements to the system. This year, just a couple of tweaks, and those are the big ones. I think they affect primarily organizations that were only in operation for a part of their continuous 12-month data collection period. That is Section 2, Question 1. So, if that applies to your year three or year four organizations, that is an important additional answer option in Section 2, Question 1 to pay attention to. It also applies to hospital-based organizations where, in the past, hospitals have seen some questions that might be extraneous about fire, police, and other public safety activities. Now, after this clarification, you won't see those.

I am going to go through a quick overview of the GADCS—we are talking about for the past 20 minutes and I just want to recap. I know that some year three and year four organizations are just coming into the GADCS system, getting up to speed, and understanding what needs to be reported, for many organizations in just a month starting on January 1, 2024. This is a general process—Ariel walked through some of these steps already. I won't belabor these points again, but there is a process that starts with step one where CMS selects randomly and then notifies participants. Those notification letters came from Medicare administrative contractors serving

the region. At this point, all NPIs that have been selected in year one, two, three, or four cohorts of the GADCS have already received that letter. A couple of quick notes here, if you are not sure whether your organization was selected in year one through year four, there are lists for all four-year cohorts on the GADCS website and a link will be on a slide or two. So that is the definitive place to check to see if your NPI was selected. In terms of the total number of organizations selected, there are roughly 10,500 NPIs that bill Medicare for ground services each year, and the four annual cohorts combined component account for roughly 10,500 NPIs. So, it is most of the NPIs in operation right now. Given the way the samples were selected annually, there were some organizations that are new to the industry, that may not have been selected at this point. Should there be future rounds of GADCS, you could be chosen to participate later.

Step two, as Ariel mentioned, there is this important initial information that you need after being selected to report to CMS. That includes contact information and a data collection period start date that determines the start point for the timeline for your organization. If you are selected and you haven't provided this initial information, as Ariel mentioned, it is crucial that you reach out to CMS and use the resources on the GADCS website to understand how to get that information in and get it in quickly. Step number three happens over the period of 12 months. Nearly all year one and year two organizations are now through step three. Many of the year three and four organizations are coming up in the 11th month of their 12-month data collection period. So even though you have not been reporting information, if you're in year three and year four, you should have been collecting information for many organizations starting January 1, 2023, and you'd wrap up on December 31, 2023. Some organizations with fiscal years that start after January 1 are on a slightly later timeline, but about two-thirds roughly of the organizations do have a January 1 data collection period start date. So those year three and four organizations should already have accumulated much of the information they'll to report to CMS. So that's the collection part.

Moving on to step four, that is when organizations actually start interacting with the web-based GADCS. Here's where you register a personal account and link that account to your organization's NPI. That is via the portal that Ariel mentioned earlier. There are instructions on how to do this online for nearly all year one and two organizations who should already have an account that's linked, and you're reporting. For year three and year four organizations, that process will really start up January 1, 2023. Step five is after you create an account and link to your NPI, one or more NPIs. Then in step five you're actually going and entering the information. Many organizations have already a spreadsheet or a kind of pen and paper version of this where you jotted down answers and it's a matter of clicking through not that many pages of a web-based survey to enter in the information. There are two different kinds of roles in the GADCS. There's a data submitter and the data certifier. So, the data submitter is entering the information and then hits submit. That sends an email to the data certifier. The data certifier opens up that submission, checks it for accuracy and completeness, and then if it is in good shape, hits certify. If it needs to be corrected, the certifier sends it back to the submitter to do revisions and then submit again to the certifier.

So how much time do year three and year four organizations have to do step five? If you've got a January 1, 2023, data collection period start date, your reporting, step five, ends May 31, 2024. So, you've got five months from the end of your data collection period to submit and certify your

information. This reporting period's closed for most but not all year one and year two organizations; actually, today's a big milestone. This is the deadline for all year one and year two organizations that have a data collection period that starts July 1. So, if you're a mid-year fiscal year organization, your data collection period would've run from the beginning of July of 2022 to mid to the end of June this year, which gives you five months to report, which happens to be today. So, after this call, some of you may be racing into the GADCS to submit and certify your information.

Step six is the notification for non-response. So as Ariel mentioned, CMS has done a lot of outreach to organizations who are missing one or more of these steps. There will, at some point, be a set of payment reduction letters that will go out to organizations that have not sufficiently completed their GADCS reporting requirement. And then it's important to keep in mind the purpose of this data collection and analysis. In the end, at the same time, Congress required CMS to collect these data, Congress also required MedPAC, the Medicare Payment Advisory Committee to run through a set of analyses and develop a report to send back to Congress with answering a set of questions that Congress posed, including some related to the adequacy of Medicare payments for ground ambulance services.

So that's the one-slide overview of the GADCS. I realized that was a lot, especially for folks who have not engaged much with GADCS up to this point, which is why I want to spend a minute just talking through the points on this resources slide. Ariel mentioned many of these already. I will highlight some of them again, do you want to point everyone's attention to the URL blue box? This is the CMS GADCS website where you can link to all of these resources. So if you are just gearing up in year three and year four to report your information next month through May for many year three and year four organizations, or you're a little behind in collection, or you're wrapping up in a year one year two organization, it's a lot of new and updated material constantly being added and refreshed from this website. And I encourage you to check it out just to point out a couple of highlights.

As I mentioned, there is a PDF of the instrument itself. If you want a paper version of the questions that you'll be asked in the GADCS to flip through and make sure you have all their acquired information. You can always look at those PDFs available in English and Spanish. At the end of those printable instruments, there's also a change log that lists the changes that CMS has implemented over the past few years. There's a long but incredibly useful resource called the GADCS User Guide. It has a set of screenshots, some FAQ, frequently asked questions, excerpts, and some helpful tips that walks through section by section, question by question of the GADCS. It's about the middle hundred pages of that document if only the bravest folks might read it cover to cover. But if you do have a specific question about a specific question, you can use that as a resource, as a kind of encyclopedia to look up what you might be curious about and to get some guidance on how to answer specific questions.

The front and the end of that user guide also have relatively brief outlines of how to get set up in the system with an account and to link to your NPI and then also how to go through the certification process at the end after the information's been submitted. There is a separate FAQ document, which, again, is a great resource if you have a specific question. It should maybe be a first stop before you pursue other options. CMS, over the years, has heard thousands, and that is

not an exaggeration, of very excellent questions from ground ambulance organizations and other stakeholders. Many of them are the same questions that come in over and over again, and so CMS has curated a set of those most common questions and included them in the ever-updated and expanding FAQ. So, all of that's available on this GADCS website. The walkthrough video that Ariel mentioned is relatively newer. It's again long but bookmarked and navigable video that walks through a narrated by yours truly walkthrough of the entire instrument, which our hope is we'll provide some targeted help for folks who, if you have questions about Section 7 on labor costs, you can listen to that section on this, or if you need just some help getting oriented and started, then there is the intro section of that walkthrough to help out. One important note about all of these resources, the GADCS printable version right now in English and the FAQ have both been updated to reflect the changes I just went through that are finalized in the CY 2024 final rule. Some of the other information, like the user guide, the Spanish version of the printable instrument, and some other documents, are in the process of being updated and will be posted as soon as possible. There are some older resources and webinar recordings from going back to the start of the GADCS that have not been updated to reflect these or prior years of rulemaking in terms of changes. So, I would pay attention to the posting date for some of the transcripts and recordings of past sessions in particular. And just to close out here, I just wanted to note that if you have additional questions, you can always reach out to the ambulance data collection mailbox that CMS monitors and responds to, and the email address is down there at the bottom of your screen. So that's the end of this walkthrough of the PFS 2024 final rule changes and a bit of an overview and walkthrough. I'll turn it back over to Jill.

Jill Darling: Thank you, Andrew. Up next and last, we have Amy Gruber.

Amy Gruber: Thank you, Jill. On September 28, 2023, CMS released Transmittal 12268 Change Request 13400 to manualize the ambulance inflation factor for Calendar Year 2024 in Chapter 15, Section 20.4 of the Medicare Claims Processing Manual so that Medicare contractors can accurately determine payment amounts for ambulance services. We included a link to this transmittal in today's agenda. The effective date of this transmittal is January 1, 2024, and the implementation date is January 2, 2024. The ambulance fee schedule, base rates, and mileage base rates are updated annually by an ambulance inflation factor, which is the Consumer Price Index for all Urban Consumers, CPI-U, June over June of the previous year, reduced by multi-factor productivity. The CPI-U is reported by the U.S. Bureau of Labor Statistics, and the multi-factor productivity is determined by CMS's Office of the Actuary. The multifactor productivity for Calendar Year 2024 is 0.4%, and the CPI-U for 2024 is 3.0%. According to the Affordable Care Act Section 3401, the CPI-U is reduced by the multifactor productivity even if this reduction results in a negative ambulance inflation factor update. Therefore, the ambulance inflation factor for Calendar Year of 2024 is 2.6%. Thank you. Back to you, Jill.

Jill Darling: All right, great. Thank you, Amy, and Andrew. We will be going into our Q&A now. So, like I mentioned at the beginning of the call, please use the raise hand feature at the bottom of your screen. Have one question, one follow-up, please, and we'll give it a moment to let folks get a chance to raise their hand.

Karen Mohr: All right. So far, we have, let's see, Lisa Breneiser, you may unmute and ask your question.

Lisa Breneiser: Thank you. My question is regarding reporting depreciation. We're a 501©(3) non-for-profit. So, although we do report depreciation, it doesn't really benefit us as a tax benefit. Does that still need to be reported in this instrument?

Andrew Mulcahy: Hi, Lisa, Andrew here. Yes, you will have to report the annual cost of ownership for each vehicle. There are a couple of options if you don't have that pre-available pre-calculated. If you do as a routine accounting practice to calculate annual depreciation for vehicles, facilities, certain types of equipment and supplies, then you should enter it in even if there aren't tax benefits for your organization. There are alternatives if a number is not available. You can always choose to report on a cash basis. So, in that case, you would only report acquisition costs for ground ambulances or facilities or equipment and supplies if they're purchased during the 12-month data collection period and otherwise, you would not report that amount. So, I'd encourage you if you do have that annual depreciation expense amount, even if you might not use it in the same way as some other organizations, I'd still encourage you to put that down for each ground ambulance.

Lisa Breneiser: Thank you.

Karen Mohr: Okay, thank you. John Lennon, you may unmute and ask your question.

John Lennon: Hey there, thanks for allowing me to chat. My agency's official certifier is waiting for his account approval to review our data. Our deadline's today because we were one of those fiscal year folks. Will there be a penalty should that approval not come today, and we end up submitting it on, say, Friday or Monday? So that'll be a late submission. Are we in trouble?

Andrew Mulcahy: Michelle, you might be able to comment a bit on the approval process for users.

Michelle Berman: Let's see. If you want, I can take a look to see where your approval process is. I just need at least a name to go with it.

Andrew Mulcahy: Michelle or Amy, would that be best to email in or?

Jill Darling: Yes, I would recommend emailing it to the ambulance ODF email. I'll put it in the chat again.

Amy Gruber: You will not be penalized if you are a couple of days late, we understand.

John Lennon: Super, thank you.

Amy Gruber: You're welcome.

Karen Mohr: Sandra Schrunk. You may unmute and ask your question. Sandra, you may be double muted. You might try unmuting your device as well as unmuting Zoom. We will circle back around. Geraldine Pena, you may unmute and ask your question.

Geraldine Pena: Hi, I was wondering if I could get an extension from the deadline of today to two weeks.

Amy Gruber: Hi Geraldine, can you please submit an email to our ambulance data collection mailbox?

Geraldine Pena: I will, thank you.

Amy Gruber: Thank you.

Andrew Mulcahy: By the way, Karen, and Jill, before we go to the next question, we have a slide on hand with some frequently asked questions and answers. I'll go ahead and put that up on the screen for folks to peruse while other questions come in.

Karen Mohr: All right, Sandra Schrunk, we'll try you again. You may unmute and ask your question.

Sandra Schrunk: Can you post again where you can see a video as to what data you are to be collecting?

Andrew Mulcahy: Sandra, I will go ahead and drop the URL in the chat. I can pop it back up on the screen, too, but it might be tough to jot down, it is this YouTube link. I will drop it in the chat now.

Sandra Schrunk: Thank you.

Karen Mohr: Jonathan Schwartz, you may unmute and ask your question.

Jonathan Schwartz: Thank you. Just going back, Andrew, before, were you saying that the different corporations can check for their NPI was chosen? I just didn't catch the end of where you were saying that that can be checked at.

Andrew Mulcahy: Sure. So, it's this URL that's actually in the top one in this blue box on the top of the slide. It's the CMS GADCS website. Just Googling CMS and GADCS usually gets me there, first hit. I will put that in chat, too.

Jonathan Schwartz: Gotcha. So just go into that link, that whole link itself, data collection systems, and then you should see a link in there saying how to check for your NPIs or what NPIs are listed?

Andrew Mulcahy: That's correct. There'll be four files, one for each of the four years, and it has NPI. If you know your NPI, that's the quickest way to search for it. It has organization name. It pulls the organization name from the Provider and Plans Enumeration System, or PPES. So that

could be a variant of the name you would typically go by, which sometimes makes it tough to search that way. There's also a primary billing and primary practice state there to make sure that you're getting to the right organization. A lot of ground ambulance organizations have very similar names. So double-check—NPI's best, but that's where you can find the four lists.

Jonathan Schwartz: Got it. Thank you.

Karen Mohr: Lisa Breneiser, you may unmute and ask your question.

Lisa Breneiser: Yes, I tried to sign up for the submission website back in October, and it was denied. Do I have to do a reapplication for the whole process again, and when can I do that? I'm a year three four submitter.

Andrew Mulcahy: Michelle, are you able to fill that one?

Michelle Berman: Yes, the role can be approved. However, reporting cannot begin for your particular NPI until January 1.

Lisa Breneiser: Okay, so I should wait to re-enroll until January 1?

Michelle Berman: Yes, you will be able to report until then.

Lisa Breneiser: Okay, thank you.

Karen Mohr: Bob Kearns, you may unmute and ask your question.

Bob Kearns: Can you hear me?

Karen Mohr: Yes, we hear you.

Bob Kearns: Under Question 7 and it might be a couple of other questions as well, what exactly is defined as public safety? I am a municipal ambulance service for a town. So, I am a town employee, and my employees are all town employees. It's a separate EMS division. It's just a standalone EMS division. Is that considered public safety?

Andrew Mulcahy: Yeah, in that case, Bob, I'd check government, which I believe is, I'm pulling the instrument up now, but I believe that's one of the categories for section two, organizational characteristics, number seven, which is organization type. So, I should suggest clicking there. The public safety option is meant to cover some catch-all cases that are beyond a fire department or police department. There are some all-hazards departments out there and some other unique arrangements, and that's what that's meant to cover. It's not really public safety, it's the other public safety as a concept. Yep. So good. Go with government and you'll be in good shape.

Bob Kearns: Thank you.

Karen Mohr: Kelly Rammel, you may unmute and ask your question.

Kelly Rammel: My question is, I'm getting ready to submit my data. How do I know who my certifier is?

Andrew Mulcahy: Yeah, that's a great question, Kelly. It varies from organization to organization. It's someone along the lines of CEO or fire chief, someone assigning authority for your organization. In principle, it's best that it's someone who's not the data submitter. Although CMS recognizes that in some very small organizations, there might not be many other folks to turn to serve in that certifier role. So, oh, go ahead.

Kelly Rammel: So, should this person have already logged in and become the certifier for our organization?

Andrew Mulcahy: Can you say that one more time? You broke up.

Kelly Rammel: Could this person have already logged in and become the certifier for our organization?

Andrew Mulcahy: Depending on whether you're in year one, two, three, or four, maybe. I think if you're three and year four, then not necessarily, there's still time to do that. If you're year one or year two and your data collection start date is January 1 through July 1 that person should expedite getting on and getting linked up to your NPI to review and certify because the deadline, the deadline for the July 1 year one, year two start dates happens to be today.

Kelly Rammel: Yes. And that's why, yeah, I'm literally finishing all of the information, and I go to hit submit, and it asks for that email, and I'm like, oh yeah, I'll have to figure it out. So, you think either our CEO or our CFO would be a good person to do that?

Andrew Mulcahy: Yeah, both of those sound reasonable.

Kelly Rammel: Okay. And I will work on that right away.

Andrew Mulcahy: Great. And as Amy mentioned, if you're in progress and it's clear you've submitted all the information waiting on that last step, I think that's an ASAP kind of thing.

Kelly Rammel: Okay, thank you very much.

Andrew Mulcahy: It will involve a separate crew approving. That can take just a little bit.

Kelly Rammel: Okay. And it's the same process as I did to become the submitter I assume.

Andrew Mulcahy: Correct.

Kelly Rammel: Yep.

Andrew Mulcahy: Okay, thank you very much.

Karen Mohr: Steven Wunsch, you may unmute and ask your question.

Steven Wunsch: Yeah, I heard earlier in the presentation when you talked about the latest changes that any of the year one or two agencies that already reported will not have to resubmit anything to address those minor changes. But my broader question is, our organization has been certified. Will you ever envision a situation where a year one, a year two reporter who has been certified will be required to essentially modify or supplement their information that they've already submitted somewhere between now and the time that the year three and four submitters are required to get their submissions in? My main concern is how closely do I need to monitor this and not put myself in a position where I may miss a required thing that would put us in non-compliance.

Andrew Mulcahy: Steve, in a small number of cases, when there's inconsistency or an error in response, CMS occasionally asks organizations to go back in, reopen a submission, go back in, and adjust something. It happens in a very small number of cases. And I'm not sure if your organization would be affected by this partial year tweak to Section 2, Question 1. If you are, I think it's probably a great idea just to let CMS know. It's also very rare, but it might be the kind of information you could pass along, but I don't believe that will ever be a change that we'll have. Just to make us aware, but that may be information that you could pass along, but I don't believe that will ever be changed.

Steven Wunsch: Everything in our organization is pretty straightforward. There really haven't been any changes. We were pretty much in the, I would call it, the normal categorization of submissions, and we did get certified, so I'm assuming everything we submitted is satisfactory. I'm just more worried about, as you're spreading all this data submission over a number of years, that somehow they're going to find out that, oh, this is all very inconsistent because different people are submitting in different ways, and now we want you to go back and fix something that you did before. I just want to make sure I don't get surprised, or can I just pretty much say, hey, set it and forget it, and we'll hear about something else in a more broad sense when they actually try to use the data to do something.

Andrew Mulcahy: As of right now, Steve, there's each NPI has only been selected once for the one round of GADCS. So, at present there's no second submission to go back and compare two to the first. And I think it's important that the information be correct and accurate. That being said, this is the first round of a new data collection effort and a lot of learning across the board. So, I can't comment beyond that other than to say as of right now, there actually is no second round to go back and compare the first round for any organization because all organizations have only been selected once, which was something that Congress built into their requirement for CMS to the extent that that could be avoided.

Steven Wunsch: Thank you.

Karen Mohr: Patty Heflin. You may unmute and ask your question. Patty, we're unable to hear you. I see that you've unmuted. Try unmuting your device. Patty? We will circle back around and

try you in just a moment. You may try unmuting the device that you are zooming on. Jonathan Schwartz, you may unmute and ask your question.

Jonathan Schwartz: Thank you. Can we just quickly review the ambulance inflation percentage calculation? I was listening to it, but it went through kind of quickly for me to be taking down notes. I just wanted to go over again how the calculation is arrived at, please.

Amy Gruber: Sure. The ambulance fee schedule base rates and mileage base rates are updated annually by an ambulance inflation factor. The calculation is the Consumer Price Index for all Urban Consumers, CPIU, and we use the June over June of the previous year, and that is reduced by multifactor productivity.

Jonathan Schwartz: And where's the multifactor productivity?

Amy Gruber: That is determined by CMS's Office of the Actuary.

Jonathan Schwartz: Is that data available to us to see what their multifactor productivity number is?

Amy Gruber: The multifactor productivity number is 0.4% and the CPIU was 3.0%. So, we subtract the CPIU minus multifactor productivity and we arrived at ambulance inflation factor per calendar year 2024 at 2.6%.

Jonathan Schwartz: Got you. And the Office of Actuary, the number, like if we wanted to get another year or so forth. Is there a site or a website that we can obtain this information at?

Amy Gruber: Can you please submit that question to our ambulance data collection mailbox and speak with our colleagues? Our colleagues from OACT (Office of the Actuary) are not on the call today, and I can check with them and then get back to you regarding the release of their productivity.

Jonathan Schwartz: Thank you.

Amy Gruber: You're welcome.

Karen Mohr: Lacey Noel, you may unmute and ask your question. Okay, Lacey, you may unmute and ask your question.

Lacey Noel: Hi, I am trying to submit some of our information, and it is not accepting our NPI number. Have you seen that before?

Andrew Mulcahy: Lacey, have you had a chance to go in and double check that the NPI has been selected for year one or year two?

Lacey Noel: So where would I find that?

Andrew Mulcahy: If you scroll, if you go into chat and scroll up just a bit, one of the links from Jill, I believe, is to the CMS GADCS website. Michelle, correct me if I'm wrong, but I think year one and year two folks can get in and link to an NPI.

Michelle Berman: They can as long as they've submitted their data collection dates.

Andrew Mulcahy: Gotcha. So, Lacey, that's a second thing to check and confirm. There's a website that I can also, well, I can send to Jill to send in chat, but there's a Palmetto GBA, which is one of the CMS Medicare Administrative Contractors. Yes. They run a web survey for you to submit your initial information. That also has to be done before you can get it.

Lacey Noel: Okay, I will start there. Thank you.

Jill Darling: All right. So, we don't see any more hands, and we are about at the top of the hour, but we do appreciate you joining us and asking your questions. I will hand it back to Ariel for closing remarks.

Ariel Winter: Thank you for attending today's Ambulance ODF session. We hope you gained some valuable information and answers to your questions on these important topics. At this point, we are concluding the session. For ODF schedule updates and email list registration, please visit the CMS website at www.cms.gov/opendoorforums, all one word. Thank you.