



Ground Ambulance Advisory Group Meeting

April 3, 2023



OFFICE of the
**INSURANCE
COMMISSIONER**
WASHINGTON STATE

Initial APCD Analysis Findings

Criteria

- Services provided from 2019 – 2022 (currently through Sept. 2022)
- Fully-insured commercial market (small number of self-insured claims)
- Place of service code 41 (Land ambulance)
- Excluded denied claims
- State of rendered service limited to WA (for ambulance services, often reported as provider's location)

Comments from last advisory group meeting

- Denied claims
 - Negligible number of denied claims reported
- Treatment but no transport code (A0998)
 - Negligible number of claims with A0998 reported
- Specialty Care Transport code (A0434) broken out separately

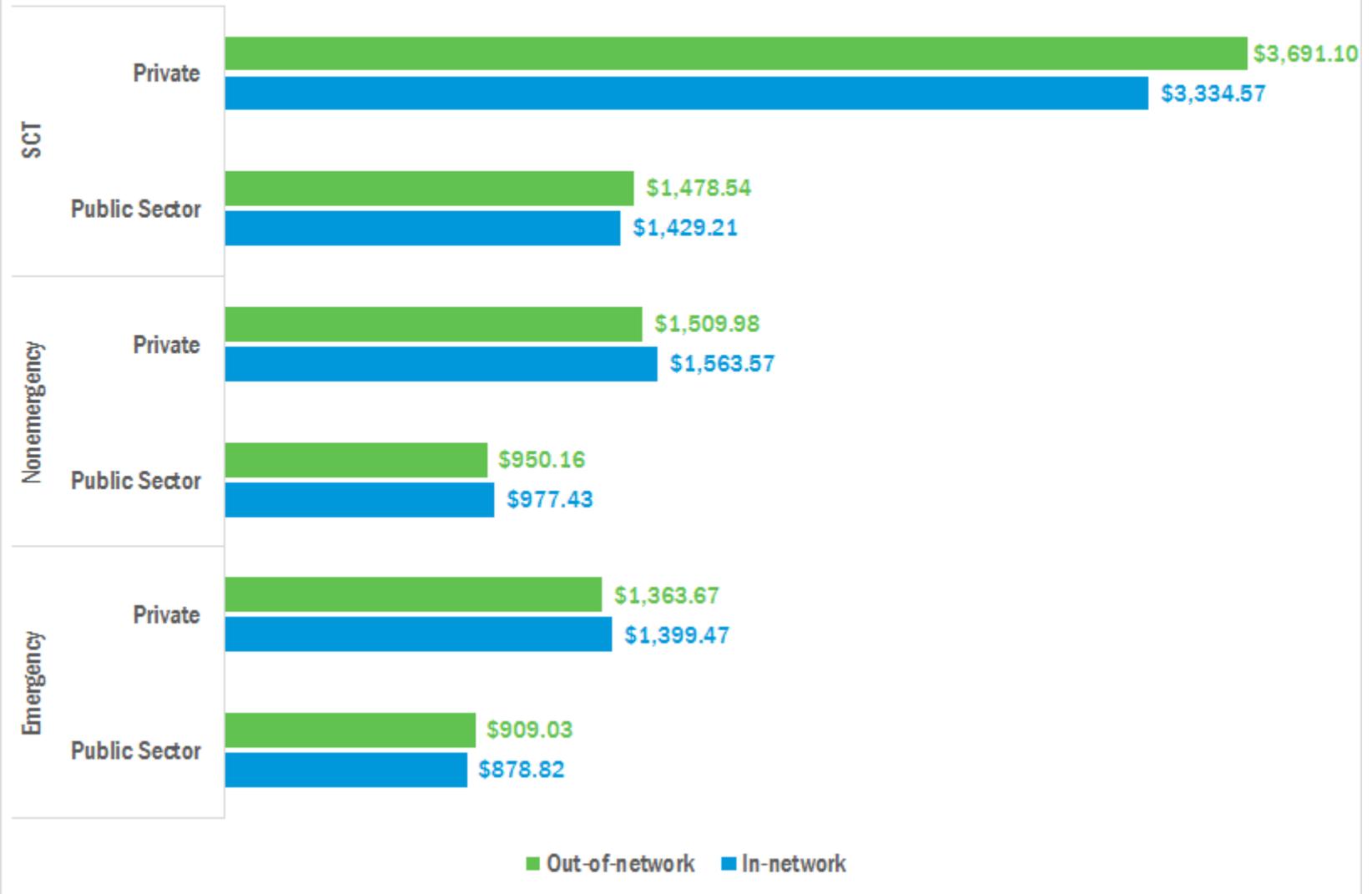
Definitions and calculations

- Ownership status
 - Based on ownership database constructed by Loren Adler and colleagues
- Transport type
 - Emergency, nonemergency, specialty care transport
- Potential surprise bill
 - The difference between the billed charges and the allowed amount for OON transports
- Enrollee cost sharing
 - Sum of deductibles, copayments and coinsurance

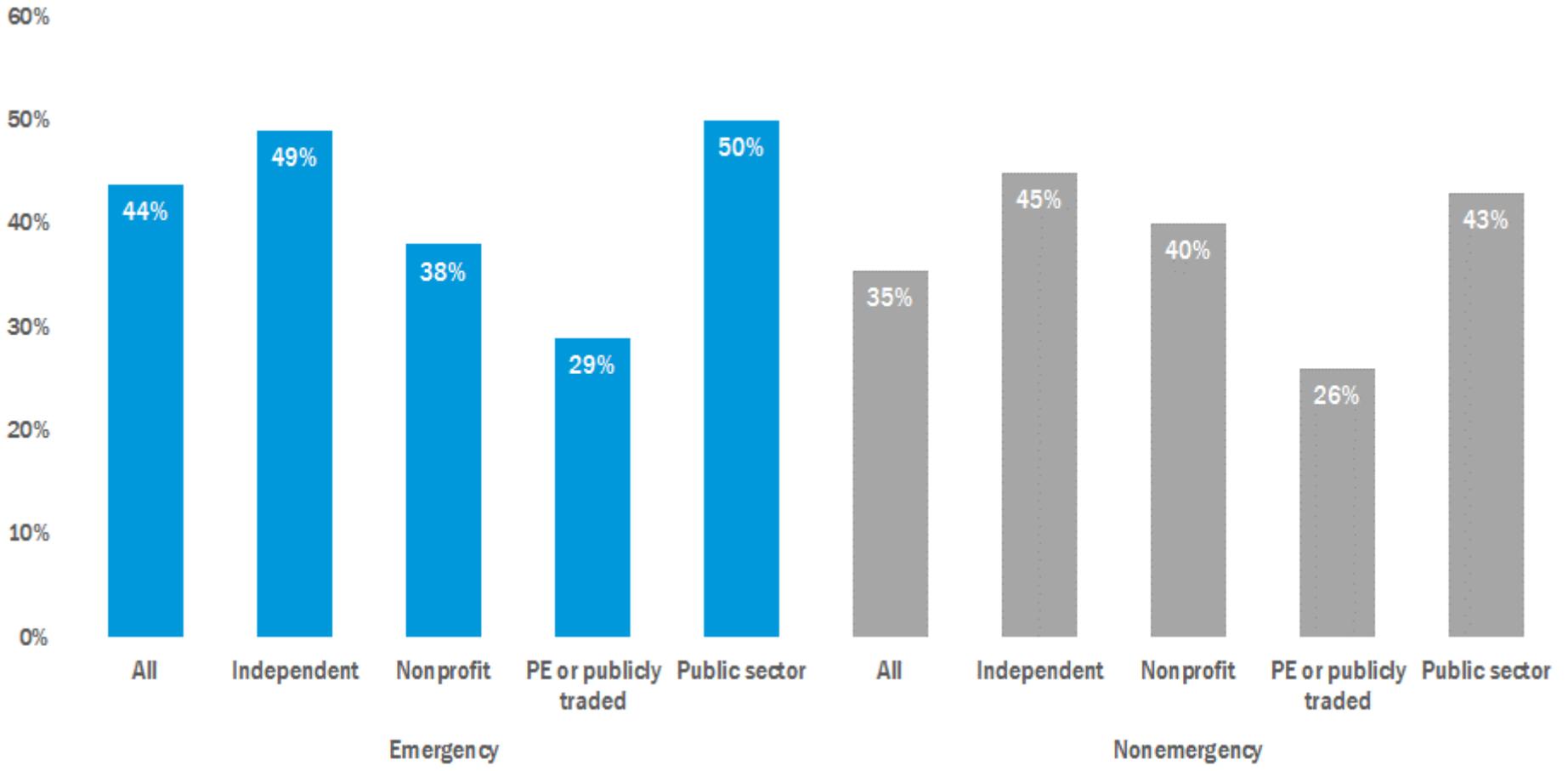
Ground Ambulance Transports, 2019-2022

Transport type	Procedure code	Claims		Share of billing code-specific claims by ownership, %				
		Number of services	Percent of services	PE and publicly traded	Nonprofit	Independent	Public	Unknown
Emergency	A0427 (ALS, level 1)	20,847	46%	27%	1%	11%	59%	2%
	A0429 (BLS)	23,457	51%	26%	1%	27%	43%	2%
	A0433 (ALS, level 2)	1,392	3%	21%	1%	7%	68%	2%
	Total emergency	45,696	77%	27%	1%	19%	51%	2%
Nonemergency	A0426 (ALS, level 1)	2,392	22%	40%	1%	44%	11%	4%
	A0428 (BLS)	8,497	78%	48%	0%	45%	4%	2%
	Total nonemergency	10,889	18%	46%	0%	45%	6%	2%
SCT	A0434 (specialty care transport)	2,756	100%	63%	0%	28%	2%	8%
	Total SCT	2,756	5%	63%	0%	28%	2%	8%
	All above codes	59,341	100%	32%	1%	24%	41%	2%

Average charged amount for in-network and out-of-network ground ambulance services, 2019 - 2022

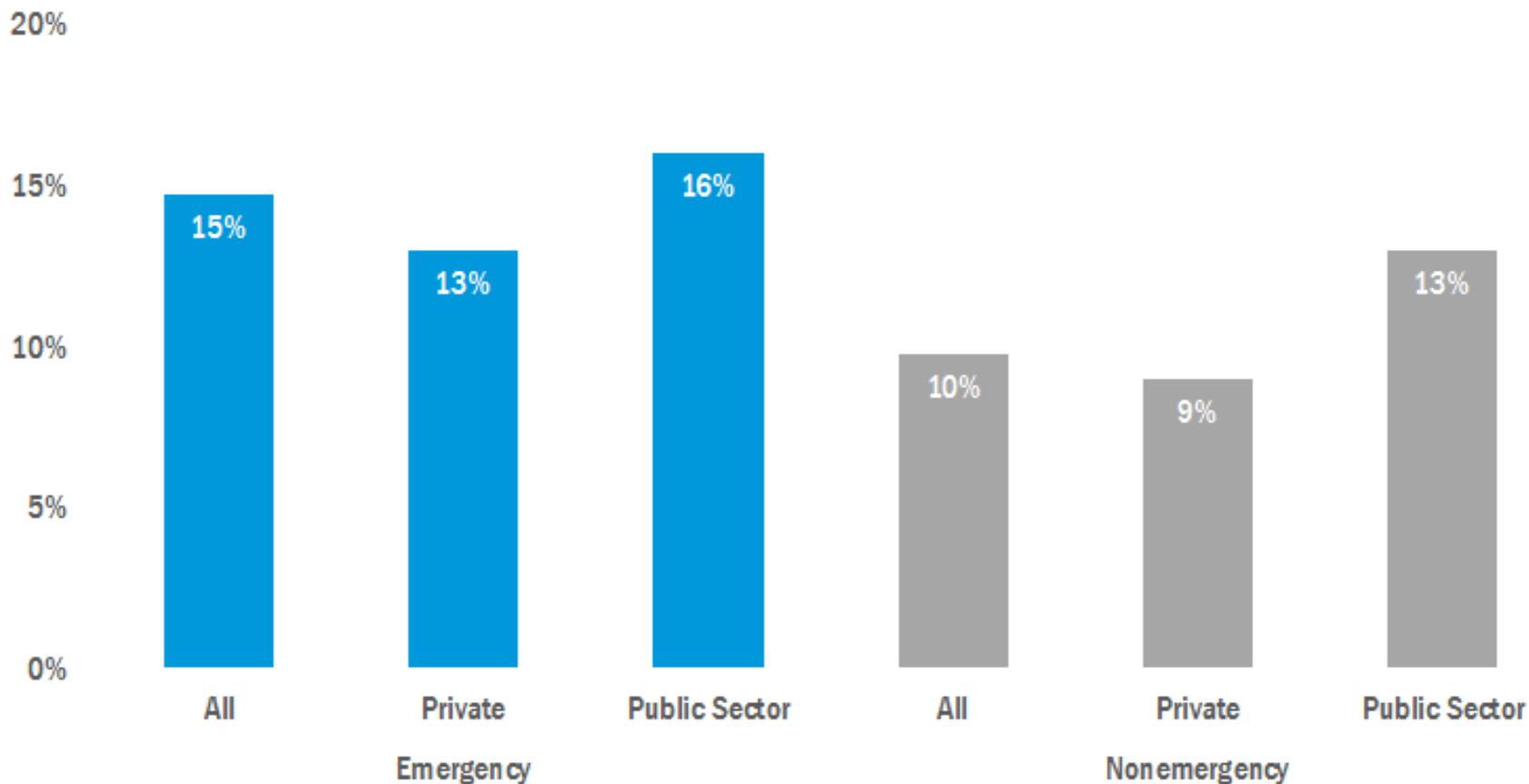


Prevalence of out-of-network utilization, by ambulance ownership type, 2019-2022

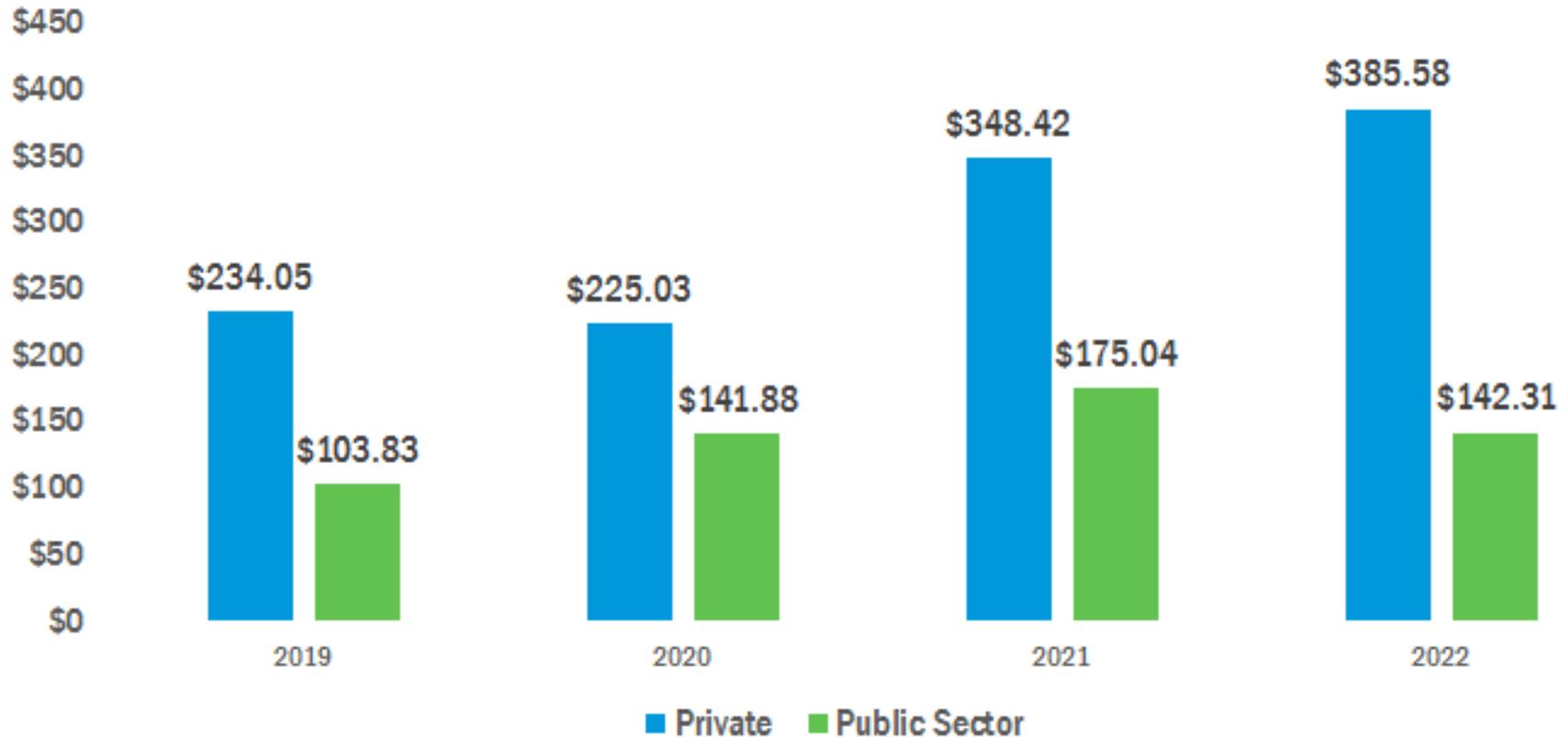


Prevalence of potential surprise bills, 2019-2022

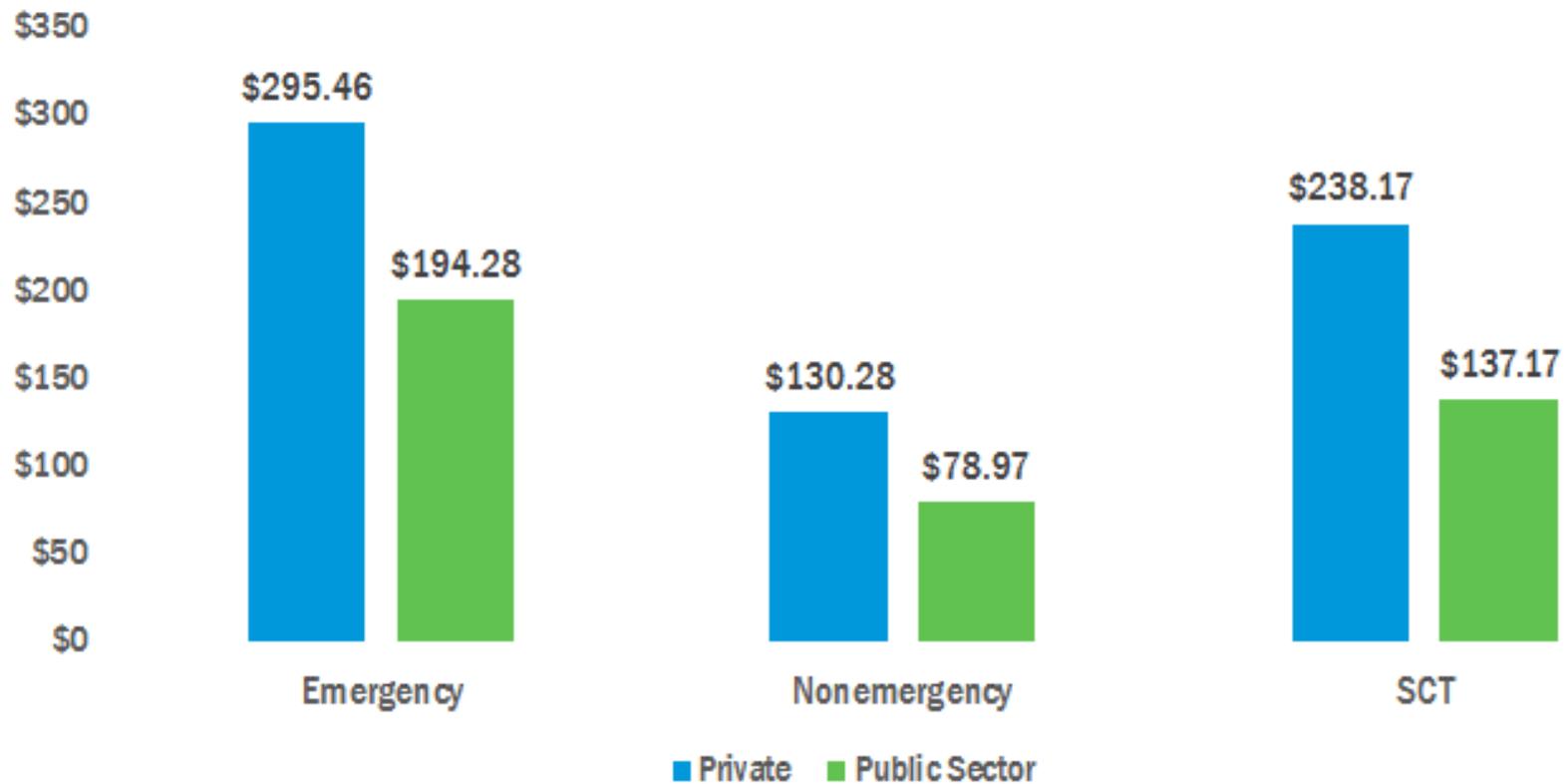
The percent of services that were out-of-network and the allowed amount was less than the full charge (allowed amount = insurer paid amount + enrollee cost sharing amount)



Average magnitude of potential surprise bills for emergency advanced life support level 1, 2019-2022



Mean cost sharing for ground ambulance services by ownership type, 2019 - 2022



Questions?

Carrier Survey Feedback

Question

Can carriers who are part of the same holding company submit a single survey response?

OIC Response

Carriers who are part of the same holding company may submit a single survey response. The survey will ask whether the responses differ across carriers, and if so, carrier specific responses will be requested.

Question

Can you use a percent change indicator for questions #9 – 13 (questions about how billed charges and allowed amounts have changed over the past 5 years) so responses can be compared across carriers?

OIC Response

A percent change indicator will be added to be able to better compare responses across carrier submissions.

Question	OIC Response
<p>Will you ask for additional information about the ground ambulance providers that the carriers have contracts with? Such as ownership status (public, private, etc.).</p>	<p>An additional breakout will be added to question 1, 2 and 3 (questions about the number of ground ambulance providers the carriers contracted with) requesting the total number contracted ground ambulance providers by ownership status (public, private)</p>

Question	OIC Response
<p>Can you provide a list of options to select from or rank for question #4 (question about the top 3 reasons for not contracting with ground ambulance providers)?</p>	<p>Options for carriers rank will be added. Options will include:</p> <ul style="list-style-type: none">- Unable to contact providers to initiate contract negotiation- Providers uninterested/unwilling to enter contract- Unable to come to agreement on reimbursement rates- Unable to come to agreement on other aspect of contract- Other (fill in response)

Question	OIC Response
Can you clarify questions #5 and 6 (questions about how carriers categorize the risk of an enrollee being balance billed during contract negotiations)?	Clarifying language will be added to these two questions to eliminate confusion.

Question	OIC Response
Will you request the carriers to provide the specific ground ambulance providers that they contract with?	A question can be added to capture the specific providers that carriers have contracts with.

Additional question suggestions

Consumer complaint questions

- How many consumer complaints, grievances and appeals have you received related to billing in excess of insurer's reimbursement from 2017 – 2022?
- Please provide data on how complaints, grievances and appeals were resolved (Number in favor of consumer vs. number against consumer) from 2017 – 2022.

Contracting questions

- How often have you attempted to contract with a nonparticipating provider from 2017 – 2022?

Additional questions

- Have you implemented any policies or practices to address ground ambulance providers' balance billing patients? If yes, please explain.
- Please provide any ideas you may have to reduce or eliminate surprise billing for ground ambulance services.
- Open response field for any additional comments/space to elaborate on previous responses.