

Centers for Medicare & Medicaid Services

Open Door Forum: Ambulance

Moderator: Jill Darling

Thursday, March 16, 2023

2:00 pm ET

Coordinator: Welcome everyone to today's conference call. At this time your lines have been placed on listen only for today's conference until the question and answer portion of our call at which time you will be prompted to press star 1 on your touchtone phone. Please ensure that your line is unmuted and please record your name when prompted so that I may introduce you to ask your question.

Our conference is being recorded and if you have any objections, you may disconnect at this time. I will now turn the conference over to our host, Ms. Jill Darling. Ma'am, you may proceed.

Jill Darling: Great, thank you so much, Jill. Good morning and good afternoon, everyone. I'm Jill Darling in the CMS Office of Communications and welcome to today's Ambulance Open Door Forum.

Before we get into the agenda, I have one brief announcement. This Open Door Forum is open to everyone, but if you are a member of the press, you may listen in, but please refrain from asking questions during the Q&A portion of the call.

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If you do have any inquiries, please contact CMS at press@cms.hhs.gov. I will hand the call off to Maria Durham for opening remarks.

Maria Durham: Thank you so much, Jill. Good morning and good afternoon, depending on where you're located. On behalf of the Centers for Medicare and Medicaid Services, we'd like to welcome you to today's CMS Ambulance Open Door Forum.

My name is Maria Durham and I'm the Chairperson for today's Ambulance Open Door Forum. I'm also the Director of the Division of Data Analysis and Market-Based Pricing, and my division falls under the Technology, Coding, and Pricing Group in CMS' Center for Medicare.

Among other things, my division is responsible for the coverage and payment policies for the Medicare Part B Ambulance Fee Schedule and the Medicare Ground Ambulance Data Collection System, or what many of you are very familiar with, the Medicare GADCS, which is what we'll be discussing primarily today.

So why is the GADCS important? And as many of you are aware, selected ground ambulance organizations are required by law to report cost, revenue, utilization and other information to CMS.

Organizations collect information over a continuous 12-month data collection period and at the end of the 12-month data collection period, organizations will have five months to report information to CMS.

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So, for Year 1 and Year 2 selected organizations, many of you are in your data reporting period right now or will be very soon. And for selected organizations in Years 3 and 4, you should be reporting your initial information: the start date of your data collection, contact folks and collect your data beginning in 2023.

The collected information will be provided to the Medicare Payment Advisory Commission (or MedPAC) which is required to submit a report to Congress on the adequacy of Medicare payment rates for ground ambulance services and the geographic variations in the cost of furnishing such services.

MedPAC is an independent federal body established by the Balanced Budget Act of 1997 to advise the U.S. Congress on issues affecting the Medicare program. It's really important that everybody report their data.

So today, we have one topic on the agenda and it's a really important topic. We're going to talk about the five tips for selected organizations. And we do want to note that on today's agenda, we included a link to information regarding the COVID-19 PHE updated guidance for ambulance organizations.

On February 9, 2023, the Department of Health and Human Services announced the PHE for COVID-19 will end on May 11, 2023. COVID-19 remains a significant priority and CMS has released fact sheets to keep you all informed, but we just wanted to note that on the agenda as well.

We are going to conclude today's Ambulance Open Door Forum with an open question and answer session. And I really just want to say a personal thank

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you to everybody for taking time out in your very busy schedule to join us today. We'll try to answer as many questions as possible.

So, without further ado, I'm going to turn it over to our moderator, Jill Darling, from our CMS' Office of Communications to introduce our first speaker.

Jill Darling: Great, thanks Maria. We have Andrew Mulcahy from RAND Corporation who will speak about the Medicare Ground Ambulance Data Collection System, the top five tips for selected organizations in Year 1,2,3, and 4.

Andrew Mulcahy: Thanks very much, Maria and Jill. I'm Andrew Mulcahy from the RAND Corporation, a nonprofit research organization helping CMS develop and implement the GADCS.

I'll be presenting today along with my colleague from RAND, Dr. Lisa Padilla. We hope everyone has the Slides in front of them. We have about a grand total of 13 Slides covering five tips.

And CMS has a wealth of information on the GADCS website. There's also been a series of educational events, webinars, and Q&A sessions over the past months and years going back to the early stages of the GADCS.

And so I want to stress a couple things up front and moving on to Slide 2 that we're going to cover these top five tips. It's intended as a resource for all ground ambulance organizations in Years 1 and 2 or in Years 3 and 4.

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We are going to draw on some of that material from these prior webinars and Q&A sessions and other documents like the GADCS FAQ document. But the comments that Lisa and I will share today don't assume you've necessarily participated in those earlier sessions or read those documents.

As Maria mentioned earlier, the phase your ground ambulance organization might find itself in in terms of preparing or interacting with GADCS is going to be a little different if you're a Year 1 and Year 2 organization versus a Year 3 or Year 4 organization.

Collectively, those four years, those four different cohorts, cover almost all but not quite all of the ground ambulance organizations that bill for Medicare ground ambulance services today so a little more than 10,000 overall.

And Years 1 and 2 are just getting to the phase where they're able to report data via the GADCS system. Year 3 and Year 4 are in an earlier phase where you've now been selected and you're collecting data that you'll report starting next year.

So, we'll talk a little bit more about the timelines later and the distinctions between what Years 1 and 2 organizations should be focusing on right now versus what Years 3 and 4 organizations should be focusing on.

But before we get into that, I'd like to turn to Slide 3 and just very quickly, mainly for the Year 3 and Year 4 organizations, just give a brief overview of what the GADCS is.

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As Maria mentioned, the GADCS is a new data collection system required by Congress. The requirement to CMS is to collect information on ground ambulance organization costs, revenue, utilization and certain other information.

CMS responds to that requirement by developing a web-based portal and a set of questions and instructions that collectively we refer to as the GADCS.

As Maria mentioned, that information that CMS collects through the GADCS will be used by MedPAC to assess the adequacy of Medicare payment for ground ambulance services.

So it's part of why, as Maria mentioned, it's important that all of the organizations selected to participate do participate and it's important that MedPAC and CMS and Congress has the benefit of information and data collected across the wide and very diverse set of ground ambulance organizations that bill Medicare for services.

So that means participation from smaller, rural, nonprofit or government organizations is just as important as participation from larger for-profit companies. And we know from research that's been done to date and from CMS' conversations with ground ambulance organizations that the costs, revenue, utilization for ground ambulance services vary substantially across organizations with different sets of those characteristics.

So the selection process for GADCS was designed to pull in equal numbers, to select equal numbers of organizations with those different sets of

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characteristics. And the hope is, and the requirement is, that as those organizations report, the data that comes in will be representative of the entire industry.

One last note on this slide about the requirement here; organizations that are selected for the GADCS and then don't sufficiently submit information may be subject to a 10% payment reduction for AFS services in a subsequent year.

So there is that important consideration here. But even aside from that, the importance of getting complete and actionable information to policy makers through this process is really important.

All right, so Lisa and I will tag team the five tips today. I'll take the first one and then pass it up to Lisa and we'll proceed through the five.

The first one is on Slide 4, and it's actually - you know what, I just noticed something I'll mention to everyone on the call. In the version I'm looking at, and I'm not sure it's on the version that's posted, for some reason the slides are numbered one more than they actually are when you print out the Slides.

So I'm looking at Slide 4 right now, but it says Slide 5. So if you're confused when I'm calling out numbers, subtract one, that should work.

So, tip one, the title here is, Familiarize Yourself with CMS' GADCS Resources. As I mentioned before, there are a wide array of resources at this point. Some of them Year 1 and Year 2 organizations may already be very

acquainted with. Others are relatively newer and even Year 1 and Year 2 organizations may not have had a chance to review them yet.

And for Year 3 and Year 4 organizations just starting to collect data, you may be less familiar with some of these resources. So I'll quickly run through some of the key ones on this slide.

The first one, and this is particularly important for Year 3 and Year 4 organizations, is the printable instrument. This is a PDF list of the specific instructions and questions that you'll have to answer through your response to GADCS.

The programmed web-based portal is up and live and running. And Year 1 and Year 2 organizations can get into that system to see what the questions look like. Years 3 and 4 organizations cannot. But they can go to the GADCS website, the URL on Slide 4, and can go in and print out the printable instrument.

Some organizations we've heard do print out that printable instrument and work on it just in pen and paper, at least as a first draft, to organize their information and their responses to the GADCS questions. And then later they'd log into the web-based portal and enter those responses.

So, if you haven't - if you've been selected for Year 3 or 4, and you haven't yet looked at this printable instrument, it's really important to do that as soon as possible because most organizations in Year 3 and Year 4, as Lisa will talk

about in a minute, will be collecting data from January 1 of this year through December 31 of this year.

So that means that some of the information that is in the printable instrument, some of the questions, will require information you already track through your billing systems or a billing vendor you use through your HR, payroll, and other internal systems.

And some of that may be information you already track. Others of the questions may require information that you may not already track or may need to tweak the way you track so that you're able to fully answer the question.

And so if you're collecting data starting January 1, it's really important to know as soon as possible if you need to make some adjustments to the way you're looking at data or tracking data so you'll be able to fully answer the questions when it comes time to report.

The GADCS User Guide is the second item on this slide. It's a relatively long document, but it is rich with information. It goes question by question, section by section, through the entire GADCS instrument with tips, additional context, entries from the separate FAQ document, which I'll talk about next.

And if you have a question, that is a good place to start the User Guide. Also, the front of the User Guide and towards the back of the User Guide covers some really important steps in the GADCS process about getting into the system, linking to your NPI. And then on the other end, after information is

submitted, the important role that the certifier plays to review the responses and certify the responses as accurate and complete.

So if you haven't flipped through that User Guide, I encourage you to at least do a quick flip to know what's there. If you are in the throes of reporting data to GADCS as a Year 1 or Year 2 organization now, that's a great place to look if you have questions as you go.

That User Guide does pull FAQ entries from the Frequently Asked Questions document. So that's a separate document that expands as CMS gets more questions from ground ambulance organizations and other stakeholders along the way, another great place to look if you have an initial question.

And then there are many prior webinars and Q&A sessions that you can access via the URL in the bottom row on this table. There are some that are a little more targeted to organizations just getting into GADCS, like an overview of the GADCS or changes from the most recent round of rulemaking.

There are also some sessions, slides, recordings, transcripts that get a little more narrowly at specific types of ground ambulance organizations. So I encourage you to take a look at that website and learn about the presentations that are posted there that you might want to listen to.

One other resource I've included on Slide 5 is an example of another kind of resource that's also posted on CMS' GADCS website. And that's a set of tip sheets that cover specific topics in a shorter format, a couple of pages, with

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helpful information and some guidance on how to tackle common scenarios in data collection and data reporting.

So on Slide 5, we have a couple of points from the allocation tip sheet. So many ground ambulance organizations provide ground ambulance services but are also a fire department or a broader Medicare provider of service, like a hospital.

For those organizations, in some cases, the expenses or revenue that you record and then report in GADCS may need to be allocated, meaning that only a share of the reported expense would be related to ground ambulance services and the balance of it would be related to other activities, like fire, police, public safety, a hospital, other kinds of healthcare delivery that's not ground ambulance.

So, this is a common scenario and one that takes a little planning and thinking ahead of time before you start to put information in so that when you do enter information and then submit and certify it, CMS and MedPAC are able to pull out a portion of that expense that is a ground ambulance portion of the expense and not rely on just the entire amount.

So the allocation tip sheet is a great example of what we hope is practical advice here that lists out different kinds of expenses, the kinds of allocation approaches that CMS has heard different ground ambulance organizations will use.

It is important to note that in general the instructions to the GADCS allow you some flexibility. The instructions allow you to use the accounting approaches you do currently use in many cases.

They also allow you to mix and match an allocation approach so that you're using ones that make the most sense for the specific cost, the specific expense or revenue you need to allocate. In general, the guidance that we talk about in the tip sheet is to use an allocation approach that's data-driven and that's linked functionally to the expense you're trying to allocate.

So for facility expenses, utilities, maintenance, share of square footage that's used for ambulance versus other activities is one approach. For vehicle expenses, share of mileage might be an approach. It's something that's measured and related to the expense you're trying to break up.

So, I encourage, if you find your ground ambulance organization is in this scenario where you're going to have to allocate expenses or revenue, I encourage you to check out this tip sheet on CMS' GADCS website.

The next slide has one more helpful piece of information and points at GADCS's flexibility around allocation. There are two main options on how to report these allocated amounts. And this gets back to the point I made earlier on GADCS allowing you to use your current approach and giving you some flexibility here.

You can either report a total expense, like the entire expense for your fire-based ground ambulance organization or your hospital-based ground ambulance organization.

You could report a total expense and then report a share of that expense that's related to ground ambulance. And then behind the scenes, the system will do that multiplication for you, for example behind the scenes will report \$70,000. Say in this case where your total expenses are \$100,000 and the ground ambulance share, you enter as 70%.

Some organizations will find that easier. Other organizations will find it a little harder to do that and may already have an allocated amount, say a separately budgeted amount for an expense. In that case, you can just enter the amount directly and then report 100% of the amount that's being related to ground ambulance services. That is another way to report the \$70,000 that is the correct response.

So you have the flexibility to do it one way or the other. There is no right or wrong way. In order to take advantage of that flexibility, that is the kind of thing that is really helpful is to think about ahead of time before you start entering information.

So again, if you haven't taken a look at that tip sheet and you're going to be allocating, I strongly suggest you do that. Let me turn it over now to Lisa to cover tip number two.

Lisa Padilla: Thanks, Andrew. So on the next slide, we talk about the importance of confirming when your organization needs to both collect and report information.

So if you have not already done so, we strongly encourage you to confirm when your organization needs to collect and report information. This is available information on the website. Organizations selected in Year 1 and Year 2 should have already been notified by CMS, as well as organizations 3 and 4, which I'll talk about in a moment.

So, focusing on organizations in Years 1 and 2, you should have already reported the start date for your continuous 12-month data collection period and contact information to CMS. For these Year 1 and 2 organizations, data collection should have already started in 2022 and data reporting should start in 2023. If not already, then soon.

So, note that organizations in Year 1 and 2 should report their data within five months after your reported data collection period ends.

Considering organizations that have been selected for Year 3 and Year 4, again, you have also already been selected and notified by CMS. Notifications went out on November 17, 2022. Organizations in Year 3 and 4 must start their data collection in 2023, and you will report your data starting in 2024.

For these organizations, you should report your organization's start date of data collection and your contact information as soon as possible. You should provide this information to Palmetto GBA, one of Medicare's Administrative

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Contractors, immediately, and you can do so via the website listed in this slide.

Diving into this a little further on Slide 8, you'll see examples of data collection and reporting timelines. So, as I mentioned earlier, CMS already selected the four groups of ground ambulance organizations to participate in the GADCS for Years 1,2,3, and 4.

Now due to the COVID-19 public health emergency, the timing of the GADCS start and end dates for those four cohorts have changed over time.

So, as you'll see at the top of this chart, the blue and yellow chart, organizations in Years 1 and 2 have a 12-month data collection period. And those are the yellow bars that now coincide with each other. Cohorts for Years 3 and 4 also have coinciding 12-month data collection periods in yellow that start 12 months later.

Drawing your attention to the blue bars, you'll see that organizations for Year 1 and 2 report data during an overlapping five-month period following their data collection period, which are the yellow bars.

You'll see this is also the case for Year 3 and Year 4 organizations who also have overlapping data reporting periods, and those are the blue bars.

It is important to note that organizations have a choice of when to start the data collection period and that choice also has downstream implications for when the five-month data reporting period will begin. If your organization has

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a fiscal year that starts on a date other than January 1, your organization will have a choice to either start the clock on January 1, so to speak, or the date on which your fiscal year starts in 2022 for Year 1 and Year 2 organizations, or in 2023 for Year 3 and 4 organizations.

If you'd like more information about the timelines for specific organizations in different contexts, you can view the FAQ document that Andrew mentioned earlier that's available on CMS' Medicare Ground Ambulance Data Collection System, or GADCS website.

I'm going to kick it back to Andrew to talk about the next tip.

Andrew Mulcahy: Thank you, Lisa. So we're on Slide 9 now, which is tip number three. This is another one that gets at a decision that's best to make early in your prep for data collection or as you report data and that's a decision on whether to use a set of three Excel templates to answer certain questions in Sections 8 and 9 of the GADCS, which cover facilities costs and vehicle costs.

In general the only way to input information in the GADCS is to go to the portal, log in, link to your NPI and then go through a set of pages on a web-based form and respond to specific questions.

In general there aren't that many questions in the GADCS and not that many pages. There are a couple of questions around facilities and vehicles where you do need to list all of your facilities and all of your vehicles in Sections 8 and 9.

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For some organizations, smaller organizations with relatively few facilities, relatively few vehicles, it'll probably be easiest just to enter that information directly into the web-based form. But for larger organizations, say a major city's fire, combined fire and ambulance department, where there will be many facilities and many vehicles, it may be easier to consider entering the information first in these Excel-based templates and then importing the template into the GADCS system.

Just to stress, this is not an approach to completely submit your data to GADCS. These templates are only applicable to the narrow set of questions that can become very burdensome for organizations to go through in the web-based portal if you have very many facilities or vehicles.

So one rule of thumb is if you have about five facilities or vehicles, it might be easier to enter the information directly in the portal. If you have five or more, you might want to take a look at the templates first. There is no requirement to go one way or the other, and it is 100% your organization's choice which approach to take here.

I think it's important just to very briefly mention that the system will still apply the same kind of checks in the data, whether or not you type it in directly or fill out a template and upload it. There's a process by which the GADCS checks the completed templates that are uploaded to make sure that all of the responses make logical sense, and it sometimes does take a couple rounds through trying to upload the data.

The system will tell you whether there are certain things that need to be corrected in specific rows. Then you can fix those, save, re-upload and then proceed when the template's accepted.

You can upload with a template and then change your responses later. You can also choose to use a template to upload for Section 8 but not 9 or vice versa.

And I did mention three templates earlier, just to avoid any confusion here, there's one template for Section 8 talking about facilities costs and then two templates for Section 9. One covers ground ambulances and the other covers non-ground ambulance vehicles.

There are slides from a separate presentation from last August as well as the Excel templates themselves up on CMS' GADCS website from an August 4, 2022 webinar. The URL is at the bottom of this slide. And if you are particularly a larger organization with many vehicles and many facilities, we encourage you to take a look at this as early in your data collection or data reporting period process so that you can tailor your collection to go down this route if you choose to use the template.

So, Lisa, I'll turn it back over to you for tip number four.

Lisa Padilla: Thanks, Andrew. And moving on to Slide 10, we're going to spend a little bit of time talking about the potential for coordinating with your billing staff or company. So within the GADCS, you will be expected to report ground ambulance service volume by billing code and revenue by payer.

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Later in the instrument, you'll be asked for revenue received, not billed, by payer. Now if your ambulance organization uses billing staff or a billing company to provide support, we do recommend that you coordinate data collection and reporting with your billing staff or company.

We also recommend you do this and connect sooner rather than later. Billing staff and companies often can run reports that may make gathering and reporting this information much easier for you.

In addition, we also recommend connecting early on with others that need to send you information. Again, a plug for taking a look at the instrument ahead of time to know what information you need to gather. This will help inform whether or not this connecting with others would be necessary.

So for instance, you may need to collect and report expenses paid by other parts of your municipal government, such as fuel, benefits, facility maintenance. So for more information, again, about what type of information you'll need to be gathering, you can look to the GADCS User Guide, which is also on the GADCS website or the instrument itself or any of the other webinars or resources that Andrew has referenced that are available to you.

Andrew, back to you to wrap it up.

Andrew Mulcahy: Thanks, Lisa. So we'll move on to tip five which is on Slide 11. And this is a tip that covers getting access to the system. And there are a couple of steps that you need to do before you can actually report your information.

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You need to register for user ID and password in CMS' Enterprise Identity Management System or IDM system. Once you have a user ID and password, you request your GADCS role.

As I hinted at earlier, there are two roles. There's a submitter and certifier role. Each organization needs to have both. The same person at a smaller organization can fill both roles, although that can be tricky to do.

The main requirements for the submitter, the main role there, is to actually enter the information into the web-based portal. And at the end when all of the information is complete, the submitter hits submit. And then that will route your submission to your organization's certifier.

The certifier should be a CEO, fire chief, someone else with the authority to sign on behalf of your organization. That person should review the responses, make sure they're accurate and complete.

If there are questions or issues, there's a cycle where you can pass back the submission to the submitter to fix it up and then resubmit it to the certifier. When that does pass muster as accurate and complete, the certifier certifies it as such. And then that completes your organization's reporting requirement to GADCS.

So, I mentioned the tip sheets up on the CMS' GADCS website. There is a portal quick tips document up on that same website that'll help you understand the initial steps to get into the system.

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There are a couple of checks against the specific names, and contact information that your organization submitted when they acknowledged receipt of their notification letter.

So as Lisa mentioned earlier, after getting that notification letter, organizations have to go to the Palmetto GBA website and provide just a couple pieces of initial information, including their organization's data collection period start date and contact information.

There is space for two people to contact. And those are individuals that will receive communication from CMS related to GADCS.

So as Lisa mentioned, if you are Years 3 and 4 or even 1 and 2 and haven't done that yet, it is crucial to go into the Palmetto system and enter that information. You won't be able to proceed through the GADCS system without entering that first.

So again, check the GADCS portal quick tips document for more help. The User Guide contains helpful information on how to get into the system as well as how to link once you're in the system, how to link your account to the NPI that's been selected that you're going to submit data for or certify data for. All of those resources are helpful to get in step by step here.

And turning to the last slide here, Slide 12, there are many questions that have come into the CMS' GADCS mailbox, and CMS staff are working as hard as they can to get through an enormous volume of questions.

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There are some common questions that come in very frequently. And so this is a slide we've put up on a few of our separate standalone Q&A sessions with the six most common general questions, many of which we've covered today, but I thought would be helpful just to very quickly walk through to close out the session today.

So the first one asks why CMS is collecting data. And the response here is that CMS is required by statute to collect this data and that it's going to be analyzed by MedPAC to assess the adequacy of Medicare payment rates for ground ambulance services.

Has my organization been selected to participate? As Lisa mentioned, at this point, all four years of organizations have been selected. The lists of NPIs for selected organizations are posted on the CMS GADCS website. And if you have been selected but haven't gotten a notification letter, that's a great opportunity to reach out to CMS or to the GADCS help desk to proceed.

Is participation required? The answer, as I mentioned earlier, is yes. Organizations that don't sufficiently submit data will receive a 10% AFS payment reduction during the next calendar year.

Lisa covered the timelines on question four. When will we need to report and collect data? The punchline there is that organizations need to collect data over a 12-month period and then report annual data just once within five months after the end of that collection period.

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Many questions about whether or not reporting needs to be monthly or annually. It is just a single reporting, and it is reporting the entire 12 months of data aggregated together, so annual data just one time.

Number five is how do I inform CMS of our data collection period start date? The link to the Palmetto website is here that we've mentioned a couple times. And again, if you haven't done that already, if you're Year 1, 2, 3, or 4, I encourage you to go through that quick questionnaire and provide a couple pieces of information as soon as possible.

And then how do we report data? For Year 1 and Year 2 organizations, the GADCS portal is now live and you can get in. Organizations, many of them, are starting to enter information now.

There's an initial date of May 31 where organizations that are reporting over a calendar year basis - who are collecting data over a calendar year basis in 2022, January 1 to December 31, will have to submit their information, certify it before May 31. So that is coming up for many Year 1 and Year 2 organizations.

For Year 3 and Year 4 organizations, that reporting period doesn't come around until January 1, 2024 at the earliest, a couple more months for data collection before there is actually any reporting.

So that'll wrap up our top tips. We appreciate your time and attention. If you have additional questions, I'll turn right back to one of my earlier slides and suggest you take a look at the GADCS FAQ document, the User Guide, the

printable instrument and instructions themselves and our prior educational webinars and Q&A sessions.

So at this point, and thank you, Lisa, for presenting some of the tips, I'll turn it back over to Jill.

Jill Darling: Great. Thanks, Andrew, and thank you, Lisa. And Jill, our operator, will you please open the lines for Q&A?

Coordinator: Certainly. At this time if you would like to ask a question, please press star 1 on your touchtone phone. Please ensure that your line is unmuted and please record your name when prompted so that I may introduce you to ask your question.

Once again, it is star 1 at this time. Please stand by for questions. And our first question is from Sue Harvey. Your line is open.

Sue Harvey: Hi, yes. I'm from the Attleborough Fire Department. We are in Year 1 or 2, 1 and 2. And I missed - there was something that we should start reporting now, the start date or something. I missed that, what she was talking about. And I was just wondering if you could clarify that for me.

Andrew Mulcahy: Sure, happy to. This is Andrew again. If you're in Year 1 or Year 2 and you haven't already submitted your data collection period start date to CMS, it's important to do that ASAP.

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The way you do that is to go to the Palmetto GBA website. They have a web form to submit some initial information. This should probably just take a couple minutes. There are questions for data collection period start date and contact information. That's most of it.

You can get there. I usually get there just by Googling Palmetto GBA, GADCS. There's also a URL in the slide deck on the last slide, Slide 12, and also one point earlier, I think Slide 7.

So you can go there. And the key thing is that data collection period start date and the contact information, that will kind of get you up and running in this process.

Sue Harvey: Thank you very much.

Coordinator: Thank you. Our next question is from (Dave Schaefer). Your line is open.

(Dave Schaefer): Hi, there. Actually I had the same question she had. And yes, that's on Page 13 of the handout number five. The website's actually there. I'm on that website right now. We had missed actually doing that originally when we got the confirmation letter, but I'm actually filling that information out now. So thank you.

Andrew Mulcahy: Excellent. Thanks for doing that. Maybe you can report back how quick it was after you finish. I think it will just take a couple of minutes.

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(Dave Schaefer): I will note one thing that it sort of times out on you and you have to hit the bottom green button saying submit and then it will reopen those fields back up for you to go ahead and enter the information. Otherwise, it sort of doesn't let you enter anything.

You enter your first information, your NPI and company name, hit the submit button and then it will let you fill out the contact information. And you can only use Chrome. You can't use Firefox.

Andrew Mulcahy: Good tip. That one I didn't even know.

CMS Update: After the Ambulance Open Door Forum, CMS researched these comments regarding the Palmetto GBA website. The website is compatible with Firefox. We ask the commenter to provide the version of Firefox that is being used and the specific issues that are being encountered when using the browser to access our website. As far as a time limit is concerned, there shouldn't be an issue there either. We are not using any authentication or processing for sessions. We are not storing any data on the form until it is sent. We have had thousands of submissions with no report of this thus far. Again, we ask the commenter to provide more specific information related to this issue.

Coordinator: Thank you. Our next question is from (Margaret Holton). Your line is open.

Margaret Holton: Hi. Thanks for taking my question. We did not receive a letter from our MAC to confirm reporting for GADCS. I was wondering how do I go about that or do I just go ahead on Palmetto and fill out the information?

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Andrew Mulcahy: You know, if you don't know whether you're Year 1, 2, 3, or 4 then you can find that out by looking for your NPI on the list posted on the GADCS website. If you know you're Year 1, 2, 3 or 4, you can just go to that Palmetto website and enter in your information.

(Margaret Holton): But there's an acknowledgement button on there, though, that says by checking this box, I acknowledge receipt of the notification letter. And I just wanted to make sure that that was okay because if you don't click that box, it won't let you move forward.

Andrew Mulcahy: Yes. That's a great question. I'm not sure if that's Maria or Amy.

Maria Durham: This is Maria Durham. You can reach out to your MAC because at this point all the MACs have acknowledged sending out the letters to get the letter itself. I would suggest the first thing that Andrew suggested, which is make sure you were selected first because you don't want to report because you weren't selected.

(Margaret Holton): I double-checked it myself.

Maria Durham: You know you were selected then, you can reach out to your MAC.

(Margaret Holton): Okay. But is it okay to go ahead and still fill out the Palmetto without that letter?

Maria Durham: You should submit. If you were selected and you are the ambulance organization, you should go ahead and fill out your information via Palmetto.

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(Margaret Holton): Okay. Thank you.

Andrew Mulcahy: It might be useful context for other folks. The letters went to the address registered in the PECOS system, which is CMS' enrollment system for providers and suppliers. So in some cases that address wasn't up-to-date. It changed over time. And that's why some organizations may not have gotten a hard copy letter.

So if you didn't get a hard copy letter, another good thing to check is the address that's in that PECOS system. It may need a refresh.

Maria Durham: Okay. Thank you. That's a great tip, Andrew.

Coordinator: Thank you. Our next question is from Lauren White. Your line is open.

Lauren White: Good afternoon. We were selected for Year 3, and we submitted our initial data back in November. But we were not given at the time an option for printing the data, and we didn't realize that we should have printed off a copy of what we were entering as we entered it.

Is there any way that we can verify what we put in? I'm sure we put in the right thing. I just want to see it and have a copy for our records. Thank you.

Maria Durham: This is Maria Durham. If you send us an email in the mailbox with your NPI, we can go ahead and take a look.

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When you submitted, it should have said, I believe there's a screen, Amy, keep me honest, that says you submitted successfully. But if you didn't keep a copy of what you entered, we can look it up for you.

Lauren White: So just send it to the ambulancedatacollection@cms.hhs.gov? That's the email address on the bottom of the initial data reporting screen.

Maria Durham: Yes.

Lauren White: Okay, great. Thank you so much. I appreciate that.

Coordinator: Thank you. Our next question is from Walt Pickett. Your line is open.

Walt Pickett: Hi. This is Walt Pickett. I had a similar question to someone who asked a question before. Just when you're filling out that initial form online, if you did not receive that notification from CMS and you know that you've checked online, you know that you are selected to participate, what I heard was that it's okay to check off that acknowledgement box saying that we did receive the letter even though we didn't. Is that correct?

Maria Durham: If you are the ambulance organization and you know you've been selected, then I would encourage you to go to Palmetto and enter your initial information.

You know, the reason this is really important is we want to make sure that the contacts that you designated are the contacts that you as the ambulance organization really truly want as your contacts.

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Walt Pickett: Correct. So it's okay to check (unintelligible) for that process.

Maria Durham: So, some ambulance organizations, will have others submit data on their behalf, but that initial submission should be done by the ambulance organization to make sure that you have the right contacts that can speak on behalf of your organization.

Walt Pickett: Quite agree, yes. So just to be clear, so that it is okay to check off that acknowledgement box when you're completing that form?

Maria Durham: And if you have not received the letter and want the letter, it is also okay to reach out to your MAC. And I think Andrew gave, you know, a great tip, because all of the letters were sent to whatever address is in PECOS. So if your PECOS address is not up-to-date, then it may not have gone to the right place, and that's probably the first place to start.

Walt Pickett: Okay, great. Yes. We'll definitely check that as well. We just wanted to make sure that we were processing this correctly. I appreciate your help. Thank you.

Coordinator: Thank you. Next question is from Jasmine Perez. Your line is open.

Jasmine Perez: Hi. I had similar question. We didn't receive an initial letter either and I just kind of found out that we were recently in reporting Year 2.

I was wondering is there any option to file or request an extension on that deadline of May 31? We're a pretty small agency that would need to gather the information by that date. Hello?

Andrew Mulcahy: Maria, would you like to take that one?

Maria Durham: Yes. Absolutely. When you go into Palmetto, you can establish your data collection period, your data collection start date within the year. So, it doesn't have to be necessarily January through December. Many people have fiscal years that are July or fiscal years that are December to December or October to October. But that reporting is based on the fiscal year that you designate.

Andrew Mulcahy: Is your fiscal year a January 1 start?

Jasmine Perez: Yes. So our reporting or our collection year would have been 2022 and our reporting year is by May 31st of this year. So we're coming up to really just having two months to collect the data and report it. So I'm kind of concerned about that timeline. So I was wondering if there's any option for an extension.

Maria Durham: What I would suggest at this point is just send us an email in the mailbox and we can give you a bigger explanation.

There is a hardship exemption that is possible that you can apply for at the end of the reporting period, but there has to be truly a significant hardship like a natural disaster, bankruptcy, a similar situation. They're very narrow and they were laid out in the Physician Fee Schedule Rule. But send us an email and we can talk offline about your options.

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Jasmine Perez: Great. Thank you.

Coordinator: Thank you. Our next question is from (Maren Maggio). Your line is open.

(Maren Maggio): Hi. Thank you. This has all been helpful information. I was just literally in the process of trying to look up our NPI organization. I believe we're probably in Year 3 or 4.

I was just wanting to get clarification again. I'm looking at the slide, the timelines for reporting. So we would be reporting our data in 2024. But our collection, does that start in the calendar year for us then? So it would be January of this year through December, obviously and then we'd have the first five months of 2024 to report. Is that correct?

Andrew Mulcahy: That's correct as long as your fiscal year starts on January 1.

(Maren Maggio): So our fiscal year actually starts April to March.

Andrew Mulcahy: Okay. Got you. April 1?

(Maren Maggio): Yes.

Andrew Mulcahy: Okay. So then your data collection period starts two weeks from now. And it would last through the end of March 2024. And then you'd have five months to report starting April 1, 2024, five months out from now. So to September.

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Everything is scaled. In other words, it just shifts the 12-month period and then the five-month period that follows it. It just shifts it to start on April 1 instead of January 1.

(Maren Maggio): Okay. I just needed that clarification because I thought you had said something about you could pick when it started and I just wanted clarification, so I appreciate that. Thank you.

Andrew Mulcahy: Just to clarify that response one bit more, I mean you do have the option to start collecting data on January 1. For organizations that have a fiscal year that starts on a date other than January 1, you still do have that choice. You can go over the calendar year or over your fiscal year. So you have the choice of starting three months ago on January 1 or two weeks from now, April 1.

(Maren Maggio): Okay, great.

Andrew Mulcahy: I have a guess of which one you're going to pick.

(Maren Maggio): Seeing how I learned about this not too long ago, I think we'll do the latter.

Andrew Mulcahy: Sounds good.

Coordinator: Thank you. Our next question is from Danielle Moline. Your line is open.

Danielle Moline: What happens if we don't have all the data that the system is requesting? Like, for example, one of the questions that I ran across was how many transports we had and how many were treated on scene without transport. And I don't

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know if I need to go through every single chart to see which were treated on scene without a transplant. So what happens if we don't have all the data?

Andrew Mulcahy: It's a great question. Some specific questions in the GADCS indicate that an estimate is okay. There are some questions that CMS heard are not regularly collected information or relatively burdensome to collect.

And so when the question says you can provide an estimate, then you're free to do so. You know, make the best guess you can, but an estimate is okay. Otherwise, the data does have to be information that reflects the actual services, expenses, revenue during your 12-month data collection period.

And there are some cases where, for organizations that are getting a late start and their data collection period started before they started collecting data, it may require a little creativity to completely report information.

You know, one important note, you can't actually submit and certify your response until all of the questions are answered. So at some point, even when a question is not asking you for a specific, an estimate, or not allowing for an estimate, you will need to do something to come up with the best response you can to fill it in to proceed.

And as another great example of - if you have a specific question about that treated at the scene question, it would be great to email into the mailbox for some advice on how to tackle that.

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(Maren Maggio): Okay. I know we can pull a good 98% of it, but there are a couple of questions that we just didn't have the answers to. We don't know how to pull that data and nor do we have the resources to go through thousands of charts to put a tally down, you know. It was difficult.

Andrew Mulcahy: Yes. Understood and you know it's a common message and I think in many of these cases there are ways to get pretty close with a fraction of the effort and happy to discuss ways that you might tackle that question.

(Maren Maggio): Thank you.

Jill Darling: And that brings us to the end of the call. So we won't be able to take any more questions, but thank you, everyone. And if you do want to follow-up, use the email that was provided or you could send it into the ambulance ODF email and that's ambulanceodf@cms.hhs.gov. And I can hand it back to Maria for closing remarks.

Maria Durham: Thanks, Jill, and thank you, Andrew, and thanks to everyone here today for attending our ambulance ODF. Hopefully everyone gained some valuable information and some answers to some of your questions regarding today's topic.

Lastly, we are getting a significant number of inquiries in our ground ambulance data collection resource mailbox. So be patient. We will answer each and every question. Feel free to submit your GADCS questions to ambulancedatacollection@cms.hhs.gov.

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And I just wanted to thank everyone for attending. And at this point we're concluding the session. Thank you.

Coordinator: This does conclude today's conference call. We thank you all for participating. You may now disconnect and have a great rest of your day.

END