

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

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Agenda

Today's presentation includes three parts:

- 1. A brief GADCS overview.
- A summary of GADCS-related proposals in the Calendar Year (CY) 2024 Physician Fee Schedule (PFS) Proposed Rule.

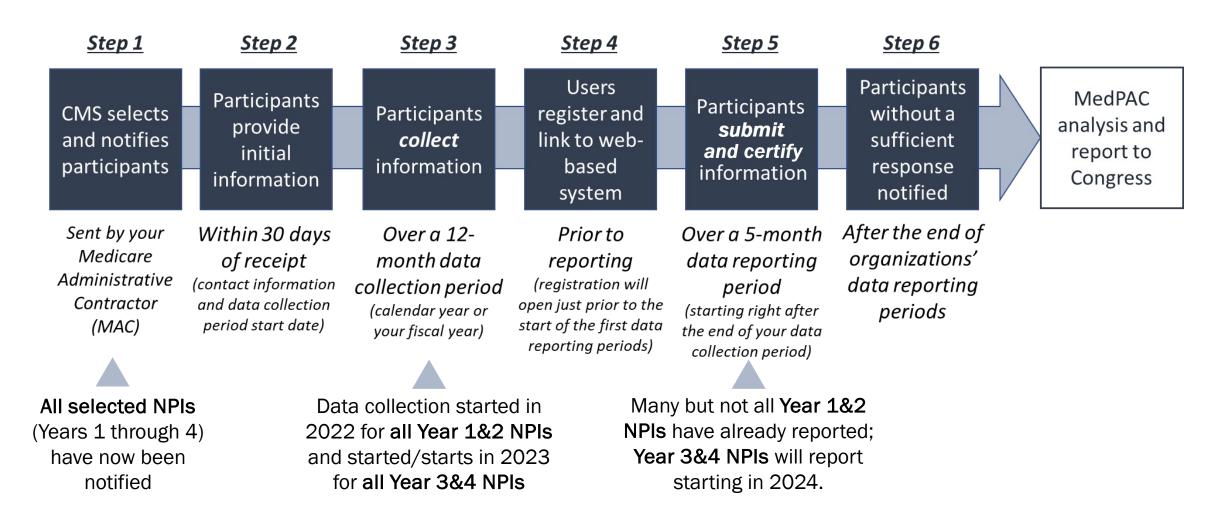
https://www.federalregister.gov/public-inspection/2023-14624/medicare-and-medicaid-programs-cy-2024-paymentpolicies-under-the-physician-fee-schedule-and-other

Beginning on page 889. Comment period ends on September 11, 2023.

3. An overview of GADCS resources

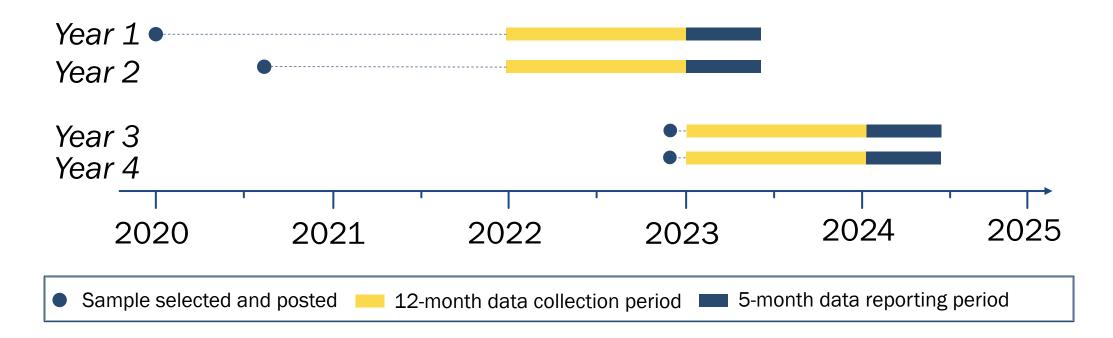
1. Brief GADCS Overview

What's the process for GADCS?



When exactly do we have to collect and report information?

Earliest and Most Common GADCS Dates: Assuming a January 1 Data Collection Period Start Date



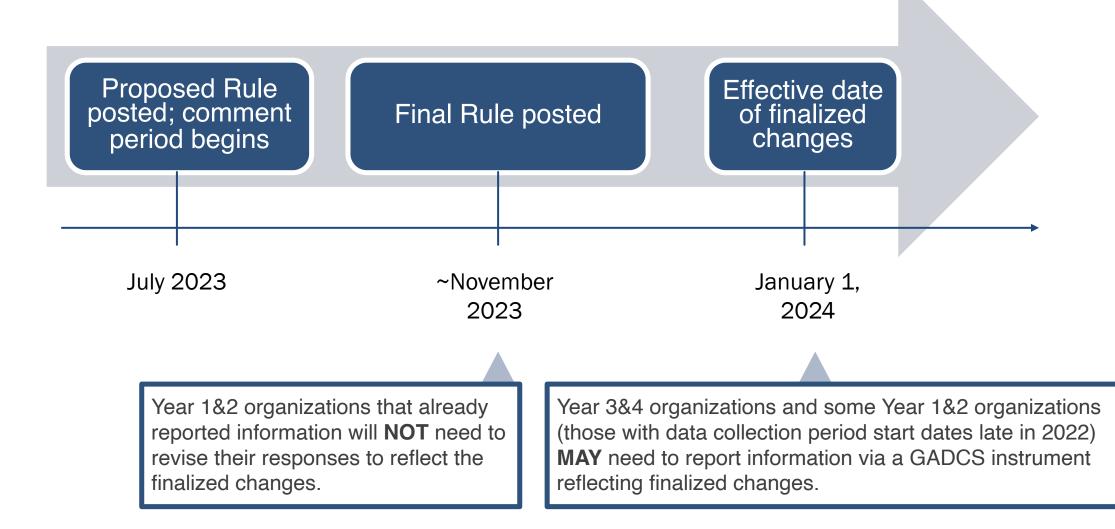
Note: NPIs can choose to collect data over a continuous 12-month period coinciding with their fiscal year starting in 2022 (for Year 1&2 NPIs) or 2023 (for Year 3&4 NPIs). In that case, the timelines in the figure above shift to the right so that the 12-month data collection period is at the start of the NPI's fiscal year.

What information does your organization need to collect and report?

Instructions	Section 1: General Survey Instructions	 Organizations must first verify they have read and understand the instructions in Section 1. Sections 1 through 3 must be completed in order; later sections can be completed in any order.
Organizational Characteristic s	Section 2: Organizational Characteristics Section 3: Service Area Section 4: Emergency Response Time	
Services Provided	Section 5: Ground Ambulance Service Volume Section 6: Service Mix	
Information on Expenses	Section 7: Labor Costs Section 8: Facilities Costs Section 9: Vehicle Costs Section 10: Equipment, Consumable, and Supply Costs Section 11: Other Costs Section 12: Total Costs	
Information on Revenue	Section 13: Revenues	

2. Summary of GADCS-related Proposals in the Calendar Year (CY) 2024 Physician Fee Schedule (PFS) Proposed Rule

Likely implementation timeline for finalized CY 2024 changes



Addressing partial-year responses

Currently:

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

CY 2024 PFS Proposed Rule Change:

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

Programming logic for hospitals and other Medicare providers of services

Currently:

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

CY 2024 PFS Proposed Rule Change:

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

Other editorial changes and technical corrections

- Propose editing Section 2, Question 3 in the printable instrument so that it aligns with the functionality now in the web-based GADCS.
 - Section 2, Question 3 in the current printable instrument asks:
 "What is the name of your organization?
 - Section 2, Question 3 in the web-based GADCS pre-populates organization name and asks for confirmation that the name is correct.
 - CMS proposes to replace the current printable instrument question with the question from the web-based GADCS.

Other editorial changes and technical corrections, con't.

- Section 9.1 and Section 9.2, Question 5:
 - Proposed change fixes incorrect language about acquisition costs and annual depreciation
 - Current: "Do not report ground ambulance acquisition costs related to an annual depreciation expense"
 - Proposed change: "Do not report an acquisition cost and an annual depreciation expense for the same ground ambulance."
- Correcting typos that do not affect the meaning of questions (e.g., punctuation correction)

3. Overview of GADCS Resources

Resources

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

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

- Past slide presentations, webinar recordings, and supplemental documents are also on this site.
 - Please note that the resources posted on CMS' GADCS website have not been updated to reflect the changes proposed in the CY 2024 PFS Proposed Rule.
 - The changes ultimately finalized in the CY 2024 PFS Final Rule will be added to the GADCS Instrument.
- If you have additional questions, please contact:
 - <u>AmbulanceDataCollection@cms.hhs.gov</u>