



Medicare Ground Ambulance Data Collection Instrument: Data Collection and Reporting for Multi-NPI Organizations

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Overview

- Today's session covers Medicare Ground Ambulance Data Collection System (GADCS) data collection and reporting requirements for ground ambulance organizations billing Medicare with more than one National Provider Identifier (NPI).
- More information is available from the Ambulances Services Center website (<https://www.cms.gov/Center/Provider-Type/Ambulances-Services-Center.html>), including:
 - A printable version of the instrument
 - A frequently asked questions (FAQ) document
 - Slides from prior webinars
 - A Quick Reference Guide

CY 2022 Physician Fee Schedule Rulemaking

- The information in this webinar reflects changes from the CY 2022 Physician Fee Schedule Final Rule.
- CMS will update the printable instrument and other resources to reflect these changes soon.
- There will be differences between the currently posted printable instrument and what we present today.
- Please check the Ambulances Services Center website and future webinars for updates
(<https://www.cms.gov/Center/Provider-Type/Ambulances-Services-Center>).

National Provider Identifiers

This session will review how organizations billing Medicare with multiple National Provider Identifiers (NPIs) should collect and report data.

- CMS used NPIs to select organizations to participate in GADCS.
- NPIs are standardized, unique identifiers used to differentiate health care providers, including Medicare providers and suppliers of ground ambulance services.

National Provider Identifiers (Continued)

- Given the complexity of our health care delivery system and the ground ambulance industry:
 - Multiple NPIs may be owned and operated by the same broader “parent organization.”
 - A single Medicare enrollment form may link to multiple NPIs.
- Parent organizations operating more than one NPI may have none, some, or all their NPIs sampled to collect and report information each year.
- For brevity, we refer to parent organizations operating multiple NPIs as “multi-NPI” organizations, regardless of whether some or all the organizations’ NPIs are sampled.
- **It is crucial to report information on costs, revenue, and utilization specific to each sampled NPI separately.**

Parent Organizations



- We use the term “parent organization” to refer to the corporate level or ‘central office’ of an organization that may own or operate more than one NPI.
- CMS has heard of several parent organization scenarios:
 - Large, for-profit ground ambulance firms operating multiple NPIs across state lines and/or due to mergers and acquisition
 - Mergers between municipal government-based ambulance organizations
 - Single organizations using multiple NPIs to bill in different jurisdictions (e.g., across state lines).

General Guidelines for Multi-NPI Organizations

- Organizations should fill out the data collection instrument once for **each** sampled NPI.
 - Data reported should reflect the organizational characteristics, service volume, costs and revenue for the **sampled NPI only**, unless otherwise specified in the question.
- Expenses and revenue at the parent organization level must be allocated to the individual sampled NPIs and reported in specific questions throughout the instrument.
- You can use whatever method of allocation makes sense for your organization. If your organization already allocates costs and revenues in this way, you may use that method. If you don't have an allocation method, you could use the share of ground ambulance transports for the sampled NPI relative to the parent organization's total number of transports across all NPIs. We'll provide some more methods and examples later on in the presentation.
- Be sure not to double count staff or other expenses. When responding to the specific multi-NPI questions, do not include staff or expenses that you already reported in prior questions.

Potential Allocation Methods

Allocation Method	Description	Considerations
Share of Total Ground Ambulance Transports	The number of transports billed by a specific NPI divided by the total number of transports across all NPIs	A relatively easy method to implement and a good default if you're not sure how to allocate
Share of Total Transport Miles by Ground Ambulances	The number of miles traveled by ground ambulances for the selected NPI divided by the total number of ground ambulance miles across all NPIs	May be a better method for parent organizations with some rural NPIs that do a small number of long-distance transports and other more urban NPIs that have a high volume of short transports
Share of total staff employed	The number of staff employed by the selected NPI divided by the total number of non-parent organization staff across all NPIs	A reasonable method for allocating central office administrative costs, like HR, where share of costs is going to be dependent on the number of staff employed by each NPI

Instrument Sections with Multiple NPI Questions

- Section 2: Organizational Characteristics (Question 2)
- Section 5: Service Volume (Question 6)
- Section 7: Labor Costs (Section 7.2, Question 3; Section 7.3 Question 1)
- Section 8: Facilities Costs (Section 8.2, Question 2; Section 8.3; Question 2)
- Section 9: Vehicle Costs (Section 9.2, Question 6; Section 9.3, Question 6)
- Section 10: Equipment, Consumable, and Supply Costs (Section 10.1, Question 4)
- Section 11: Other Costs (Question 2)

Instrument Sections Not Addressed Today

- Sections 3, 4, 6 (service area, emergency response times, and service mix)
 - There are no questions or instructions specific to services shared with the parent organization in these sections
 - Only report data for the sampled NPI
- Sections 12 asks about total costs for the sampled NPI and Section 13 asks about revenues
 - Any parent organization costs allocated to the sampled NPI should be included in the total
 - There are no specific questions for multi-NPI organizations about revenue; only report revenues for the selected NPI

Section 2: Organizational Characteristics

Section 2, Question 2 asks:

Is this NPI part of a larger “parent organization” that owns or operates multiple NPIs billing for ground ambulance services? Yes (1) / No (0)

- If your organization answers “Yes” to this question, additional questions will appear in subsequent sections that ask you to report a portion of costs incurred at the level of the parent organization to the sampled NPI.
- All other questions should be answered from the perspective of the sampled NPI only.

Section 5: Service Volume

Unless otherwise noted, all Section 5 questions refer to the sampled NPI only.

Question 6: What was the total number of ground ambulance transports for your organization during the reporting period, across all payer types, and regardless of the level of service or geography? (Enter number)

Question 6a: Here we are interested in ALL of the NPIs associated with your parent organization/central office. What was the total number of ground ambulance transports across all of the NPIs operated by your parent organization/central office during the reporting period, across all payer types and regardless of the level of service or geography? (Enter number)

Note: Question 6 has a second part (6a) for organizations with multiple NPIs, asking for the total number of transports across all NPIs operated by the organization.

Section 7: Labor sampled for Multiple-NPI Organizations

- Report staffing and labor costs for the sampled NPI only, except where specifically asked for a share of labor costs incurred at the parent organization level.
- Do not report any parent organization staff in Question 2: Administration, Facilities, and Medical Director Staff Category.

– Administrative functions at the parent organization level are reported in Question 3 of this section:

Please report the allocated portion of administrative labor costs incurred at the level of the parent organization/central office of this NPI based on your organization's approach for allocating costs to specific NPIs. (Enter dollar amount.)

Sections 7.2, Question 3 Example

Parent Organization:

- Executive Director: \$100,000
- HR Specialist: \$60,000
- Payroll Specialist: \$50,000

NPI 1 (Selected for Sampling):

- 1 Station manager, 9 EMTs

NPI 2:

- 1 Station manager, 4 EMTs

NPI 3:

- 1 Station manager, 24 EMTs

Total Compensation at Parent Organization Level	Allocation Factor, Using Number of Staff per NPI	Amount Reported in Question 3
$\$100,000 + \$60,000 + \$50,000 =$ \$210,000	$(1+9)/(1+9+1+4+1+24) =$ 25%	$\$210,000 * 25% =$ \$52,500

Sections 8.2, Question 2 and Section 8.3, Question 2

- These questions ask you to report a portion of facilities costs incurred at the level of the parent organization to the sampled NPI:
 - **Section 8.2, Question 2:** Please report the allocated portion of **lease or ownership facilities costs** incurred at the level of your parent organization/central office (e.g., corporate or regional buildings, garages or service facilities serving multiple NPIs) to this NPI based on your organization's approach for allocating annual costs to specific NPIs. (Enter dollar amount)
 - **Section 8.3, Question 3:** Please report the allocated portion of **insurance, maintenance, utilities, and taxes costs** incurred at the level of your parent organization/central office (e.g., corporate or regional buildings, garages or service facilities serving multiple NPIs) to this NPI based on your organization's approach for allocating costs to specific NPIs. (Enter dollar amount)
- Other parts of Section 8 are filled out as normal for the sampled NPI.

Section 8.2, Question 2 Example

- This example parent organization operates 5 NPIs.
- The selected NPI has 2,000 ground ambulance transports while the other 4 NPIs each have 1,000 ground ambulance transports per year.
- The parent organization leases a central office where the executive and administrative staff is housed.

Total Annual Lease/Ownership Facility Costs at Parent Organization Level	Allocation Factor, Using Transports per NPI	Amount Reported in Question 2
1 building * \$3,000 per month * 12 months = \$36,000	$2000/6000 =$ 33%	$\$36,000 * 33\% =$ \$12,000

Section 9.2, Question 6 and Section 9.3, Question 6

- These questions ask you to report a portion of vehicle costs incurred at the level of the parent organization to the sampled NPI:
 - **Section 9.2, Question 6:** Please report the allocated portion of **non-ambulance vehicle costs** incurred at the level of the parent organization/central office of this NPI based on your organization's approach for allocating costs to specific NPIs. (Enter dollar amount)
 - **Section 9.3, Question 6:** Please report the allocated portion of **registration, license, insurance, maintenance, and fuel costs** incurred at the level of the parent organization/central office of this NPI based on your organization's approach for allocating to specific NPIs. (Enter dollar amount)
- Other parts of Section 9 are filled out as normal for the sampled NPI.

Section 9.2, Question 6 Example

- This example parent organization operates 10 NPIs.
- The selected NPI is in a rural location with a small number of long transports whereas the other NPIs are in more urban locations.
- The selected NPI has ground ambulances that traveled 10,000 miles on transports during the data collection period.
- All 10 NPIs had a combined 200,000 miles of ground ambulance transport miles during the data collection period.
- The parent organization owns three vehicles it uses to conduct business travel for the administrative staff to the 10 NPIs and estimates each vehicle has \$2,000 of depreciation costs per year.

Total Annual Lease/Ownership Vehicle Costs at Parent Organization Level	Allocation Factor, Using Transports Miles per NPI	Amount Reported in Question 6
3 vehicles * \$2,000 per year = \$6,000	10,000/200,000 = 5%	\$6,000*5% = \$300

Section 10. Equipment, Consumables, and Supply Costs

- You will be asked to report costs to your organization for the following categories:
 - Capital Medical Equipment
 - Medications
 - Other medical equipment, supplies, and consumables
 - Capital non-medical equipment
 - Uniforms
 - Non-medical supplies
- Only report equipment, consumables, and supplies *partially or totally* related to ground ambulance operations.
- Fill out Section 10 for the sampled NPI, except where asked to report a portion of costs incurred at the parent organization level.

Section 10.2, Question 4

Please report the allocated portion of **non-medical equipment and supply expenses** incurred at the level of the parent organization/central office of this NPI based on your organization's approach for allocating costs to specific NPIs.
(Enter dollar amount)

Section 11. Other Costs

- Section 11 asks for information on expenses not reported in other sections.
- There are several questions and multiple categories in Section 11 allowing you to report:
 - Contracted services (e.g., billing, accounting, vehicle maintenance/repair, IT support)
 - Other expenses (e.g., biohazard waste and medication removal fees, laundry, board of directors/trustees expenses, event/meeting costs)
- As with other sections, report only costs for the sampled NPI, except where asked to report a portion of costs incurred at the parent organization level.

Section 11, Question 5

Please report the allocated portion of these **miscellaneous costs** incurred at the level the parent organization/central office of this NPI based on your organization's approach for allocating costs to specific NPIs. *(Enter dollar amount)*

Resources

- Access a printed version of the instrument and frequently asked questions document from the Medicare Ambulances Services Center website (note that the printed instrument does not yet include the CY 2022 finalized changes indicated in this presentation):
 - <https://www.cms.gov/Center/Provider-Type/Ambulances-Services-Center>
- Past slide presentations, webinar recordings, and supplemental documents are also on this site. Note that past presentations in 2019 and 2020 do not reflect recent changes from the CY 2022 Physician Fee Schedule Final Rule.
- If you have additional questions, please contact:
 - AmbulanceDataCollection@cms.hhs.gov

Q&A



Please submit questions using the “Q&A” button at the bottom of your Zoom screen. If selected, presenters will read your question and respond during the session. CMS will respond to unanswered questions by email. This slide lists common questions and answers for reference.

Frequently Asked Question	Answer
1. Has my organization been selected to participate?	1. Lists of selected organizations are at the website above. CMS will send notification letters to all selected organizations beginning in November 2021.
2. What if my organization isn't on the year 1 or year 2 lists?	2. It is very likely that your organization will be selected in a future year. CMS will announce when it selects year 3 and year 4 organizations.
3. Is participation required?	3. Yes. Organizations that do not sufficiently submit data will receive a 10% payment reduction.
4. When will we need to collect and report data?	4. The FAQ at the website above includes examples. In brief, organizations <i>collect</i> data over a continuous 12-month period and <i>report</i> data within 5 months after the data collection period ends.
5. How do I inform CMS of our data collection period start date?	5. Notification letters will have instructions on reporting your data collection period start date to your MAC. The period can align with the calendar year or your fiscal year.
6. How do we report data?	6. CMS is developing a web-based portal that will launch in late 2022. CMS will share more information, including training sessions, when available.

Note: Answers to many other questions are at the Ambulances Services Center webpage:
<https://www.cms.gov/Center/Provider-Type/Ambulances-Services-Center>