



# Ground Ambulance & Patient Billing Advisory Committee

**Welcome & Introduction to GAPB Subcommittees**



Asbel Montes, Committee Chair  
Shaheen Halim, Designated Federal Official

# Background

- This Advisory Committee is Authorized by the No Surprises Act (part of the Consolidated Appropriations Act of 2021) – Section 117.
- Federal Advisory Committee Act (FACA) governs the formation and operation of this Committee.
- Committee Membership was formally announced in December 2022.
- The 1<sup>st</sup> Public Meeting of the Committee was held on May 2 & 3, 2023



# Statutorily Mandated Scope



Review options for:

- Improving the **disclosure of charges and fees** for ground ambulance services.
- **Better informing consumers** of insurance options for ground ambulance services.
- **Protecting consumers from balance billing.**

# Statutorily Mandated Purpose

- The Advisory Committee must submit a **report** that includes **recommendations** to the Depts. of Health & Human Services, Labor, and Treasury pertaining to:
  - Disclosure of charges and fees for ground ambulance services and insurance coverage.
  - Consumer protection and enforcement authorities of the three Departments, and State authorities.
  - The prevention of balance billing to consumers.
  - The report is due 180 days after the date of the 1st Committee meeting.
- The GAPB Advisory Committee will **not deviate** from the topics that must be covered in the committee's report per the authorizing legislation.

# Subcommittee Work

- 2 subcommittees were formed to research specific issues under consideration by the Committee:
  - **Network Adequacy & Cost/Payment Structures**
  - **Public/Consumer Disclosure & Coverages**
- Today's meeting will focus on the preliminary findings and recommendations of these 2 subcommittees.
- A detailed agenda is posted on the GAPB Website:  
<https://www.cms.gov/regulations-guidance/advisory-committees/advisory-committee-ground-ambulance-and-patient-billing-gapb>

# Public Comment (1 of 3)

**The Committee seeks public comment on the following issues under consideration:**

- Should balance bills for ground ambulance services be prohibited (as with services currently under the purview of the No Surprises Act)?
- Would it be appropriate to incorporate ground ambulance services into existing NSA protections?
- Should any protections apply to non-emergency transports? If so, should those protections differ for emergency transports?
- Should any protections apply to assessment, first responder, or other non-covered fees?
- How can meaningful public and /or consumer disclosures be crafted?
- Should there be cost-sharing limitations for EMS in Medicare Advantage?
- Should there be a federal, universal EMS benefit?



# Public Comment (2 of 3)

**The Committee seeks public comment on the following issues under consideration:**

- Should EMT's and Paramedics be classified as providers?
- Should state and local governments specify the out-of-network reimbursements?
- Should a public utility model be deployed?
- Should emergency ambulance services be considered “in-network” since the consumer has no choice when they call 9-1-1?
- We are seeking information related to examples where consumers receive bills from ambulance providers for services not covered by an insurance carrier.
- What communities or areas in the United States are without emergency ambulance service coverage?
- Should NSA protections apply to volunteer ambulance service agencies?

# Public Comment (3 of 3)

- **Short Comments** (~ 3 sentences) can be submitted via the chat function at certain times during today's meeting.
  - Please include your name & organizational affiliation when using the chat feature.
- **Lengthy Comments** (more than 3 sentences) should be submitted via email to: **gapbadvisorycommittee@cms.hhs.gov**
- Public Comment can be submitted to this email address at any time. **However**, please submit comments on the specific topics listed in the detailed agenda by **September 5, 2023** to ensure timely consideration.



# Welcome

- Committee Members
- Special Guests
  - National Highway Traffic Safety Administration (NHTSA)
  - National Emergency Medical Services Information System (NEMSIS) Technical Assistance Team
  - HHS Office for Civil Rights (OCR)

# Review

- Weekly subcommittee meetings
  - Every Wednesday, 1pm EST
    - Network Adequacy & Cost/Payment Structures (Rogelyn McLean & Lee Resnick)
    - Public/Consumer Disclosures & Coverages (Loren Adler & Patricia Kelmar)
- Subject Matter Expert Presentations
  - State Regulators
  - Industry Experts
  - Federal Agencies

# Today's Expectations

- Subcommittee Updates
  - Preliminary findings
- Committee Dialogue
  - Q & A
- Public Input
  - Transparency and Inclusion