

Centers for Medicare & Medicaid Services  
Questions and Answers  
Open Door Forum: Ambulance  
Thursday, November 30, 2023

1. Question: My question is regarding reporting depreciation. We're a 501©(3) non-for-profit. So, although we do report depreciation, it doesn't really benefit us as a tax benefit. Does that still need to be reported in this instrument?
  - a. Answer: Yes, you will have to report the annual cost of ownership for each vehicle. There are a couple of options if you don't have that pre-available pre-calculated. If you do as a routine accounting practice to calculate annual depreciation for vehicles, facilities, certain types of equipment and supplies, then you should enter it in even if there aren't tax benefits for your organization. There are alternatives if a number is not available. You can always choose to report on a cash basis. So, in that case, you would only report acquisition costs for ground ambulances or facilities or equipment and supplies if they're purchased during the 12-month data collection period and otherwise, you would not report that amount. So, I'd encourage you if you do have that annual depreciation expense amount, even if you might not use it in the same way as some other organizations, I'd still encourage you to put that down for each ground ambulance.
2. Question: My agency's official certifier is waiting for his account approval to review our data. Our deadline's today because we were one of those fiscal year folks. Will there be a penalty should that approval not come today, and we end up submitting it on, say, Friday or Monday? So that'll be a late submission. Are we in trouble?
  - a. Answer: You will not be penalized if you are a couple of days late, we understand.
3. Question: I was wondering if I could get an extension from the deadline of today to two weeks.
  - a. Answer: An extension for the inquirer to report her organization's GADCS data was approved for no later than 12/31/23.
4. Question: Can you post again where you can see a video as to what data you are to be collecting?
  - a. Answer: GADCS walkthrough video link:  
<https://www.youtube.com/watch?v=hSf8YIOWSys>
5. Question: Were you saying that the different corporations can check for their NPI was chosen?

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- a. Answer: It's this URL that's actually in the top one in this blue box on the top of the slide. It's the CMS GADCS website. Just Googling CMS and GADCS usually gets me there, first hit. I will put that in chat, too.  
<https://www.cms.gov/medicare/payment/fee-schedules/ambulance/medicare-ground-ambulance-data-collection-system>
- i. Question: So just go into that link, that whole link itself, data collection systems, and then you should see a link in there saying how to check for your NPIs or what NPIs are listed?
  - 1. Answer: That's correct. There'll be four files, one for each of the four years, and it has NPI. If you know your NPI, that's the quickest way to search for it. It has organization name. It pulls the organization name from the Provider and Plans Enumeration System, or PPES. So that could be a variant of the name you would typically go by, which sometimes makes it tough to search that way. There's also a primary billing and primary practice state there to make sure that you're getting to the right organization. A lot of ground ambulance organizations have very similar names. So double-check—NPI's best, but that's where you can find the four lists.
- 6. Question: I tried to sign up for the submission website back in October, and it was denied. Do I have to do a reapplication for the whole process again, and when can I do that? I'm a year three four submitter.
  - a. Answer: The role can be approved. However, reporting cannot begin for your particular NPI until January 1.
    - i. Question: Okay, so I should wait to re-enroll until January 1?
      - 1. Answer: Yes, you will be able to report until then.
- 7. Question: Under Question 7 and it might be a couple of other questions as well, what exactly is defined as public safety? I am a municipal ambulance service for a town. So, I am a town employee, and my employees are all town employees. It's a separate EMS division. It's just a standalone EMS division. Is that considered public safety?
  - a. Answer: Yes, in that case, I'd check government, which I believe is, I'm pulling the instrument up now, but I believe that's one of the categories for section two, organizational characteristics, number seven, which is organization type. So, I should suggest clicking there. The public safety option is meant to cover some catch-all cases that are beyond a fire department or police department. There are some all-hazards departments out there and some other unique arrangements, and that's what that's meant to cover. It's not really public safety, it's the other public safety as a concept. So good, go with government and you'll be in good shape.

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8. Question: I'm getting ready to submit my data. How do I know who my certifier is?
- a. Answer: It varies from organization to organization. It's someone along the lines of CEO or fire chief, someone assigning authority for your organization. In principle, it's best that it's someone who's not the data submitter. Although CMS recognizes that in some very small organizations, there might not be many other folks to turn to serve in that certifier role.
    - i. Question: Could this person have already logged in and become the certifier for our organization?
      - 1. Answer: Depending on whether you're in year one, two, three, or four, maybe. I think if you're three and year four, then not necessarily, there's still time to do that. If you're year one or year two and your data collection start date is January 1 through July 1 that person should expedite getting on and getting linked up to your NPI to review and certify because the deadline, the deadline for the July 1 year one, year two start dates happens to be today.
        - a. Question: Yes. I'm literally finishing all of the information, and I go to hit submit, and it asks for that email, and I'll have to figure it out. So, you think either our CEO or our CFO would be a good person to do that?
          - i. Answer: Yes, both of those sound reasonable.
9. Question: I heard earlier in the presentation when you talked about the latest changes that any of the year one or two agencies that already reported will not have to resubmit anything to address those minor changes. But my broader question is, our organization has been certified. Will you ever envision a situation where a year one, a year two reporter who has been certified will be required to essentially modify or supplement their information that they've already submitted somewhere between now and the time that the year three and four submitters are required to get their submissions in? My main concern is how closely I need to monitor this and not put myself in a position where I may miss a required thing that would put us in non-compliance.
- a. Answer: In a small number of cases, when there's inconsistency or an error in response, CMS occasionally asks organizations to go back in, reopen a submission, go back in, and adjust something. It happens in a very small number of cases. And I'm not sure if your organization would be affected by this partial year tweak to Section 2, Question 1. If you are, I think it's probably a great idea just to let CMS know. It's also very rare, but it might be the kind of information you could pass along, but I don't believe that will ever be a change that we'll have. Just to make us aware, but that may be information that you could pass along, but I don't believe that will ever be changed.

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- i. Comment from participant: Everything in our organization is pretty straightforward. There really haven't been any changes. We were pretty much in the normal categorization of submissions, and we did get certified, so I'm assuming everything we submitted is satisfactory. I'm just more worried about, as you're spreading all this data submission over a number of years, that somehow they're going to find out that this is all very inconsistent because different people are submitting in different ways, and now we want you to go back and fix something that you did before. I just want to make sure I don't get surprised, or can I just pretty much say, hey, set it and forget it, and we'll hear about something else in a more broad sense when they actually try to use the data to do something.
    - 1. CMS comment back: As of right now, there's each NPI has only been selected once for the one round of GADCS. So, at present there's no second submission to go back and compare two to the first. And I think it's important that the information be correct and accurate. That being said, this is the first round of a new data collection effort and a lot of learning across the board. So, I can't comment beyond that other than to say as of right now, there actually is no second round to go back and compare the first round for any organization because all organizations have only been selected once, which was something that Congress built into their requirement for CMS to the extent that that could be avoided.
10. Question: Can we just quickly review the ambulance inflation percentage calculation? I was listening to it, but it went through kind of quickly for me to be taking down notes. I just wanted to go over again how the calculation is arrived at, please.
- a. Answer: Sure. The ambulance fee schedule base rates and mileage base rates are updated annually by an ambulance inflation factor. The calculation is the Consumer Price Index for all Urban Consumers, CPIU, and we use the June over June of the previous year, and that is reduced by multifactor productivity.
    - i. Question: And where's the multifactor productivity?
      - 1. Answer: That is determined by CMS' Office of the Actuary.
        - a. Question: Is that data available to us to see what their multifactor productivity number is?
          - i. Answer: The multifactor productivity number is 0.4% and the CPIU was 3.0%. So, we subtract the CPIU minus multifactor productivity and we arrived

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at ambulance inflation factor per calendar year 2024 at 2.6%.

1. Question: Thank you. And the Office of Actuary, if we wanted to get another year or so forth. Is there a site or a website that we can obtain this information at?

- a. Answer: Prior productivity adjustments that were applied to the Ambulance Inflation Factor (AIF) can be found on transmittals on the CMS website. Below are links to the AIF productivity adjustments for CY 2017 through CY 2023. We also provided a link to the document describing the methodology for projecting Total Factor Productivity for the Private Nonfarm Business Sector.

CY 2017 -

<https://www.cms.gov/regulations-and-guidance/guidance/transmittals/downloads/r3625cp.pdf>

CY 2018 -

<https://www.cms.gov/outreach-and-education/medicare-learning-network-mln/mlnmattersarticles/downloads/mm10323.pdf>

CY 2019 -

<https://www.cms.gov/outreach-and-education/medicare-learning-network-mln/mlnmattersarticles/downloads/mm11031.pdf>

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CY 2020 -

<https://www.cms.gov/outreach-and-education/medicare-learning-network-mln/mlnmattersarticles/downloads/mm11497.pdf>

CY 2021 -

<https://www.cms.gov/files/document/mm12031.pdf>

CY 2022 -

<https://www.cms.gov/files/document/r11044cp.pdf>

CY 2023 -

<https://www.cms.gov/files/document/r11642cp.pdf>

Total Factor Productivity  
Methodology

[https://www.cms.gov/research-statistics-data-and-systems/statistics-trends-and-reports/medicareprogramratesstats/downloads/tfp\\_methodology.pdf](https://www.cms.gov/research-statistics-data-and-systems/statistics-trends-and-reports/medicareprogramratesstats/downloads/tfp_methodology.pdf)

11. Question: I am trying to submit some of our information, and it is not accepting our NPI number. Have you seen that before?

a. Answer: have you had a chance to go in and double check that the NPI has been selected for year one or year two? CMS GADCS website:

<https://www.cms.gov/medicare/payment/fee-schedules/ambulance/medicare-ground-ambulance-data-collection-system>

<https://www.palmettogba.com/palmetto/gambulance.nsf/entryInput?ReadForm>

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