



Ground Ambulance & Patient Billing Advisory Committee

Potential Legislative and Regulatory Options to Prevent Balance Billing



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NAIC Position

- No formal stance on ground ambulance
- Supported inclusion of air ambulances in the No Surprises Act due to:
 - Complaints
 - Costs
 - Industry practices
 - Court rulings

Ground Ambulance Environment

- National environment:
 - Most operated by government entity
 - 8% operated by hospitals
 - 30% operated by private companies
 - Source: KFF, [Ground ambulance rides and potential for surprise billing](#), 2021
- Not included in No Surprises Act
- Ground ambulances regulated at state and local level
- Split regulation of payers—state and federal

Suggested Objectives

- Limit cost growth
- Keep consumers in mind, get them out of the middle
- Inform consumers of any new protections
- Maintain state and local regulations
- Support efficient emergency response system

Considerations

- Variety in structure and billing practices
- Existing state and local regulations
- Existing federal law
 - ERISA
 - ACA
 - EMTALA

Options

- Extend the No Surprises Act to include ground ambulance
- Set standards for states/localities
- Develop new federal legal framework
- Regulate provider billing
- Regulate payer coverage

Questions