



386 River Point Drive  
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3/23/2020

Mr. Frank Berry, Commissioner  
Department of Community Health  
State of Georgia  
2 Peachtree Street  
Atlanta, Georgia 30303-3141

Dear Commissioner Berry:

On behalf of the members of the Georgia Emergency Medical Services Association, (GEMSA), who are large and small, for-profit, not-for-profit and governmental emergency medical services companies, I write today to ask your assistance for the ground ambulance service providers who are amongst the first-line health care providers likely to encounter suspected cases of COVID-19. Our members provide emergency and non-emergency ambulance services across the State of Georgia. In particular, ground ambulance service providers need our help to waive specific Medicare/Medicaid restrictions and increase Medicaid reimbursement to allow ground ambulance service providers to comply with public health efforts enacted by local, State, and the federal government. We outline the specific requests below and would welcome the opportunity to speak with you or your staff, to address any questions you might have about our requests.

1. GEMSA asks DCH to waive the regulatory restrictions that cover ground ambulance services, but only if patients are transported to or from a hospital or skilled nursing facility, and to designate transport of all patients requiring isolation precautions as Advanced Life Support (ALS) rather than Basic Life Support (BLS).



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During this declared State of Emergency, ambulance providers are burdened with the responsibility of providing logistical support to healthcare systems by efficiently and effectively transporting patients in an unencumbered manner. It becomes critical that healthcare professionals are able to order and receive ambulance transport services that are streamlined and free from delays. Currently these professionals have the added step of obtaining prior authorization from Medicaid Managed Care plans for those patients deemed medically necessary for ambulance transportation.

GEMSA asks that DCH extend the waiver of prior authorization requirements for Medicaid beneficiaries requiring ambulance transportation as determined by the patient's physician and/or primary practitioner.

Given the unique nature of this situation, we also ask that DCH deem transports requiring isolation precautions as ALS. The need to follow strict isolation protocols, the required engagement of paramedics, and decontamination procedures make the cost of medical care and transports involving suspected or diagnosed COVID-19 patients similar to existing ALS procedures.

2. GEMSA asks DCH to adjust the Transportation Services Fee Schedule 2020 for Ground Ambulance, Emergency and Non-Emergency, to the Federal Medicare Allowable Fee Schedule for same services, including adopting HCPCS A0425 for the reimbursement of loaded miles driven.

As residents and businesses within the State of Georgia restrict activity within their communities, essential services must continue at full capacity. Many systems of care are primarily funded or subsidized by user fees. First Responders functioning through the ambulance response system are not able to accept or deny services based on the patient's ability to cover the cost of these services. First Responders will respond, assess, treat and transport ALL patients regardless of ensuring adequate reimbursement. Ambulance providers across the State of Georgia need to maintain the full availability of



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services and maximize dollars to sustain a high level of clinical care. The cost of maintaining this essential service will continue to skyrocket as ambulance providers grapple with additional special needs.

First and foremost, ambulance providers are ensuring all First Responders have the necessary gear and personal protective equipment needed to function on a daily basis. Ambulance providers are and will continue to experience an unprecedented supply chain demand for gloves, gowns, masks, disinfectant products, ventilators, pharmaceuticals, etc. These costs are not reimbursed by any means and pose a threat to the economics and viability of operations.

Secondly ambulance services are ensuring optimum staffing levels within their communities while challenged with providing for those First Responders that will have special needs as a result of school closures, family medical needs, supply shortages and other limitations. Ambulance services across the state are now burdened with heavy staffing costs as a result. The use of overtime, extra staffing hours, time-off pay and other benefits are required in this time of uncertainty.

Lastly, medical transportation of the sick and injured will see a change of pattern. As we are seeing across the country, patients are being routed to various destinations and in some cases, distant centers that have the ability to treat specific symptoms and diagnosis. The current Medicaid fee schedule does not compensate the ambulance provider for the cost per mile and will become an obstacle for the safe and efficient transport of patients.

### 3. Conclusion

On behalf of GEMSA and the ground ambulance First Responders throughout the State of Georgia, I want to thank you for the efforts DCH is making to ensure that Medicaid beneficiaries have access to the



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medical services they need during the COVID-19 outbreak. We all want to ensure these beneficiaries have the same level and access to services and that the ambulance providers servicing them sustain those levels.

Please do not hesitate to contact me if you would like to discuss our recommendations or if there is additional information we can share with you about how ground ambulance service providers are helping during this crisis. We stand ready to help DCH and the State of Georgia any way we can.

Sincerely,

Kimberly Littleton  
Executive Director

Chad Black  
Chairman, Board of Directors