

August 8, 2023

To the Office of the Insurance Commissioner Policy Group:

The Association of Washington Cities (AWC) has concerns regarding the impacts of balance billing on ground ambulance transport provided by cities across Washington.

We understand that it is the intention of the Ground Ambulance Balance Billing Study Advisory Group to recommend to the legislature that ground ambulances be included in the Balance Billing Prohibition Act. We understand the importance of protecting consumers from surprise medical bills, and would ask your office to please consider the following points:

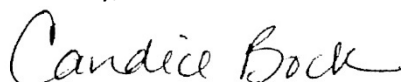
1. **"In-Network" Treatment:** Take steps to mandate insurers in Washington treat all ambulance providers as "in-network" or limit patients' out-of-pocket expenses to the "in-network" rate.
2. **Regulated Minimum Reimbursement:** Implement regulations for minimum insurance reimbursement and benefit levels to safeguard both providers and consumers from insurer policy changes that undermine the legislation's intent. For example, consider using an index such as "350% of Medicare payment rate" or similar. This rate is consistent with what has been proposed and adopted in other states.
3. **Three-Way Dispute Resolution:** Include insurers in the dispute resolution process, along with consumers and providers, to create a more balanced and comprehensive resolution mechanism that provides some insurer responsibility.
4. **Ground Emergency Medical Transportation (GEMT) Program Funding:** Advocate for maintaining the current funding for the GEMT program, as it indirectly affects municipal reimbursement for ambulance services. GEMT provides supplemental payments to government owned ambulance services & fire departments for providing emergency medical care to Medicaid recipients. It is essential to acknowledge that the proposed legislation may impact reimbursement levels and could potentially negatively intersect with the Washington Health Care Authority's plan to reduce reimbursement to government ambulance services through the GEMT program. This could adversely affect municipalities in Washington.

Many Washington cities provide ambulance transport as a service for their residents. These services are not money generating services for cities. Nor are cities a profit generating entity like insurers or some medical providers so we cannot afford to subsidize this service. Without adequately addressing the potential financial impacts to these municipal services, it is possible these changes could result in cities ceasing to provide ambulance transport for their residents.

We appreciate your consideration of the above points and ask that the OIC work directly with ground ambulance providers to make these new rules work best for service providers and customers.

If you have any questions or concerns, please feel free to contact me.

Sincerely,



Candice Bock, Government Relations Director  
Association of Washington Cities