Reimbursement Policy

Ambulance Services

REIMBURSEMENT POLICY NUMBER: 23

INSTRUCTIONS FOR USE: Company reimbursement policies serve as guidance for the administration of plan benefits. Reimbursement policies do not constitute medical advice nor a guarantee of coverage. Company reimbursement policies are reviewed annually. The Companies reserve the right to determine the application of reimbursement policies and make revisions to reimbursement policies at any time. The scope and availability of all plan benefits are determined in accordance with the applicable coverage agreement. Any conflict or variance between the terms of the coverage agreement and Company Reimbursement Policy will be resolved in favor of the coverage agreement.

SCOPE AND APPLICATION

Provider Type:

Plan Product:

□ Commercial

☑ Medicaid/Oregon Health Plan (OHP)

POLICY STATEMENT

NOTES:

This policy addresses reimbursement for ambulance transports. For medical necessity/coverage
determinations for ambulance transports, see separate Medical Policies in the "Cross
References" section below.

SCOPE: Providence Health Plan, Providence Health Assurance, and Providence Plan Partners as applicable (referred to individually as "Company" and collectively as "Companies").

- The Company has adopted Centers for Medicare and Medicaid Services (CMS) guidelines regarding ambulance services and billing.
- The policy applies to all lines of business, except when otherwise indicated.
- Provider contract language and payment methodology may vary.
 - I. Reimbursement for ambulance transport to the nearest appropriate facility includes payment for the following items and services:
 - A. Base rate payment.
 - B. Mileage payment.
 - C. All personnel supplies and services provided during the transport.
 - II. Vehicles used as an ambulance must have customary patient care equipment and first aid supplies, including reusable devices and equipment such as backboards, neckboards, and inflatable leg and arm splints. These are all considered an integral part of the general ambulance service and reimbursement for them is included in the payment rate for the transport itself. Therefore, the following items and services are included in the fee schedule payment for the ambulance transport and are **not** to be billed separately:
 - A. Oxygen (HCPCS (A0422)
 - B. IV drug therapy and drugs (A0394)
 - C. Other supplies (A0382, A0384, A0392, A0396, A0398)
 - D. Extra attendants (HCPCS (A0424)
 - E. EKG testing (e.g., ancillary services)
 - F. Mileage for distance traveled **beyond** the closest appropriate facility (A0888).
 - III. Ambulance claims must use origin and destination modifiers as appropriate to the transport provided.
 - IV. Ambulance claims must use **one of the following** appropriate place of service (POS) codes:
 - A. 41: Ambulance Land
 - B. 42: Ambulance Air or water
 - C. 99: Other place of service not identified (for non-transport ambulance claims only)
 - V. It is the provider's responsibility to supply the Plan with information that supports the condition of the member and that an ambulance transport was necessary. This includes the use of ICD-10 diagnosis codes. While EMTs/paramedics do not "diagnose" patient's, any ICD-10 diagnosis code(s) used should best describes the member's condition at the time of transport. When a diagnosis is not confirmed, it is recommended to use a symptom, finding, and/or injury code. Ambulance providers should avoid using ICD-10 codes to report "rule out" or "suspected" diagnoses.
 - VI. Ambulance providers can also use **condition codes** on claims to demonstrate the condition of the member at the time of transport. Transport condition codes may include the following:

- A. AK: Air ambulance required.
- B. AL: Specialized treatment/bed unavailable.
- C. AM: Non-emergency medically necessary stretcher transport required.
- D. B2: Critical Access Hospital ambulance attestation that it meets criteria for exemption from ambulance fee schedule.
- VII. Ambulance providers can be either hospital- (or institutional) -based <u>or</u> non-hospital based (e.g., an independently owned and operated ambulance service company, a volunteer fire and/or ambulance company, a local government run firehouse-based ambulance, etc.). For hospital-based ambulance providers, claims must be reported with the appropriate type of bill (13X, 22X, 23X, 83X, and 85X). For SNFs, ambulance cannot be reported on a 21X type of bill.
- VIII. If air ambulance transport was used, but ground ambulance transport would have sufficiently met the clinical needs of the individual, payment for the air ambulance transport may be based on the payment amount for ground ambulance transport.
- IX. If air ambulance transport was medically appropriate (i.e., ground transportation was contraindicated, and the patient required air transport to a facility), but the patient could have been treated at a facility **nearer** than the one to which they were transported, the air transport payment may be limited to the rate for the distance from the point of pickup to the nearer facility.

Ambulance Response and Treat, No Transport - Medicare Advantage Plan Members

III. While Original Medicare does not cover "non-transport" services (aka, treat and release) (HCPCS A0998), Medicare Advantage Plan benefits **may** allow ambulance services received through the 911 emergency medical response system when the patient received treatment but do not ride in the ambulance (member copayment or coinsurance may apply). HCPCS code A0998 should be used instead of an unlisted code (A0999) for these non-transport situations.

Ambulance Services for Deceased Members

- IV. Calculation for reimbursement for **ground ambulance** services for deceased members may be determined as follows, based on when pronouncement of death took place:
 - A. Pronouncement made while enroute or upon arrival at the hospital or final destination: Payment is limited to the medically necessary level of service provided during the transport.
 - B. Pronouncement made *after* the ambulance call was made and ambulance dispatched, but *prior to* pick-up and loading: Payment is limited to BLS base rate only. No mileage or rural adjustment will be provided.
- V. Calculation for reimbursement for **air ambulance** services for deceased members may be determined as follows, based on when pronouncement of death took place:
 - A. Pronouncement made *after* take-off, but *before* being loaded; Payment limited to air base rate only [i.e., fixed wing or rotary wing], no mileage or rural adjustment.

- B. Pronouncement made *after* being loaded on board, but *prior to or upon* arrival at receiving facility: Coverage is unaffected. Claim is allowed as if the member hadn't passed away.
- VI. Reimbursement may **not** be made for either ground or air ambulance transport for deceased members if IV or V above is not met.

POLICY GUIDELINES

BACKGROUND

Reimbursement is made for ambulance services based on CMS fee schedule amounts.¹ Oregon Health Plan (OHP) or Medicaid may also use the OHP Fee-for-Service Fee Schedule.²

Not all ambulance services may be eligible as a covered benefit, and some ambulance services may not be separately reimbursable. Ambulance vehicles are required to have customary patient care equipment and first aid supplies, including but not limited to: reusable devices and equipment such as backboards, neckboards, and inflatable leg and arm splints. **Equipment on an ambulance is considered an integral part of the general ambulance service and reimbursement for the use of such equipment is included in the payment rate for the transport itself.** The purpose of this policy is to assist ambulance providers with appropriate billing for ambulance services.

Member plan benefits allow coverage for ambulance services for both emergency and non-emergency situations to the nearest appropriate facility that can provide care if they are furnished to a member whose medical condition is such that other means of transportation could endanger the person's health or if authorized by the plan.

When ambulance services are not for an emergency situation, it should be documented that the member's condition is such that other means of transportation could endanger the person's health and that transportation by ambulance is medically required.

This applies to air ambulance (fixed and rotary wing), as well as ground ambulance services. Water ambulance services are also included, and considered "ground" ambulance services according to Medicare.

DEFINITIONS

Ambulance. Any vehicle used as an ambulance must be designed and equipped to respond to medical emergencies and, in nonemergency situations, be capable of transporting individuals with acute medical conditions. The vehicle must comply with State or local laws governing the licensing and certification of an emergency medical transportation vehicle. At a minimum, the ambulance must contain a stretcher, linens, emergency medical supplies, oxygen equipment, and other lifesaving emergency medical equipment and be equipped with emergency warning lights, sirens, and telecommunications equipment

as required by State or local law. This should include, at a minimum, one 2-way voice radio or wireless telephone.

BLS. BLS, or basic life support, is transportation by ground ambulance vehicle and the provision of medically necessary supplies and services.

ALS. ALS, or advanced life support, is sorted by "level" or service rendered.

<u>ALS Level 1 (ALS1)</u> is the transportation by ground ambulance vehicle and the provision of medically

necessary supplies and services, including the provision of an ALS assessment by ALS personnel or at least one ALS intervention.

<u>ALS Assessment</u> is an assessment performed by an ALS crew as part of an emergency response that was necessary because the patient's reported condition at the time of dispatch was such that only an ALS crew was qualified to perform the assessment. An ALS assessment does not necessarily result in a determination that the patient requires an ALS level of service. In the case of an appropriately dispatched ALS Emergency service, as defined below, if the ALS crew completes an ALS Assessment, the services provided by the ambulance transportation service provider or supplier shall be covered at the ALS emergency level, regardless of whether the patient required ALS intervention services during the transport, provided that ambulance transportation itself was medically reasonable and necessary.

<u>ALS Intervention</u> is a procedure that is in accordance with state and local laws, required to be done by an emergency medical technician-intermediate (EMT-Intermediate) or EMT-Paramedic. An ALS intervention must be medically necessary to qualify as an intervention for payment for an ALS level of service. An ALS intervention applies only to ground transports.

<u>ALS Level 1 (ALS1) – Emergency</u> is the provision of ALS1 services, as described above, in the context of an emergency response.

Advanced Life Support, Level 2 (ALS2) is the transportation by ground ambulance vehicle and the provision of medically necessary supplies and services including (1) at least three separate administrations of one or more medications by intravenous (IV) push/bolus or by continuous infusion (excluding crystalloid fluids) or (2) ground ambulance transport, medically necessary supplies and services, and the provision of at least one of the ALS2 procedures listed below:

- a. Manual defibrillation/cardioversion;
- b. Endotracheal intubation;
- c. Central venous line;
- d. Cardiac pacing;
- e. Chest decompression;
- f. Surgical airway; or
- g. Intraosseous line.

To qualify for the ALS2 level of payment, medications must be administered intravenously. Medications that are administered by other means, for example: intramuscularly, subcutaneously, orally, sublingually, or nebulized do not support payment at the ALS2 level rate.

The IV medications are administered in standard doses as directed by local protocol or online medical direction. It is not appropriate to administer a medication in divided doses in order to meet the ALS2 level of payment. For example, if the local protocol for the treatment of supraventricular tachycardia (SVT) calls for a 6 mg dose of adenosine, the administration of three 2 mg doses in order to qualify for the ALS 2 level is not acceptable.

The administration of an intravenous drug by infusion qualifies as one intravenous dose. For example, if a patient is being treated for atrial fibrillation in order to slow the ventricular rate with diltiazem and the patient requires two boluses of the drug followed by an infusion of diltiazem, then the infusion would be counted as the third intravenous administration and the transport would be billed as an ALS 2 level of service.

The fractional administration of a single dose (for this purpose, meaning a "standard" or "protocol" dose) of a medication on three separate occasions does not qualify for ALS2 payment. In other words, the administering 1/3 of a qualifying dose 3 times does not equate to three qualifying doses to support claiming ALS2-level care.

<u>ALS Personnel</u> are individuals trained to the level of the emergency medical technician-intermediate (EMT-Intermediate) or paramedic.

EMT-Intermediate. EMT-Intermediate is an individual who is qualified, in accordance with state and local laws, as an EMT-Basic and who is also certified in accordance with state and local laws to perform essential advanced techniques and to administer a limited number of medications.

EMT-Paramedic. EMT-Paramedic possesses the qualifications of the EMT-Intermediate and, in accordance with state and local laws, has enhanced skills that include being able to administer additional interventions and medications.

Specialty Care Transport (SCT). SCT is the interfacility transportation of a critically injured or ill beneficiary by a ground ambulance vehicle, including the provision of medically necessary supplies and services, at a level of service beyond the scope of the EMT-Paramedic. SCT is necessary when a beneficiary's condition requires ongoing care that must be furnished by one or more health professionals in an appropriate specialty area, for example, emergency or critical care nursing, emergency medicine, respiratory care, cardiovascular care, or an EMT-Paramedic with additional training.

Interfacility Transportation. For purposes of SCT payment, Medicare defines an interfacility transportation as one in which the origin and destination are one of the following: a hospital or skilled nursing facility that participates in the Medicare program or a hospital-based facility that meets Medicare's requirements for provider-based status.

Paramedic Intercept (PI). PI services are ALS services provided by an entity that does not provide the ambulance transport. This type of service is most often provided for an emergency ambulance transport in which a local volunteer ambulance that can provide only BLS level of service is dispatched to transport a patient. If the patient needs ALS services such as EKG monitoring, chest decompression, or IV therapy, another entity dispatches a paramedic to meet the BLS ambulance at the scene or once the ambulance is on the way to the hospital. The ALS paramedics then provide services to the patient.

Emergency Response. Under Medicare, "emergency response" is a BLS or ALS1 level of service that has been provided in immediate response to a 911 call or the equivalent. An immediate response is one in which the ambulance provider/supplier begins as quickly as possible to take the steps necessary to respond to the call. The nature of an ambulance's response (whether emergency or not) does not independently establish or support medical necessity for an ambulance transport. Rather, coverage always depends on, among other things, whether the service(s) furnished is actually medically reasonable and necessary based on the patient's condition at the time of transport.

Bed-confinement. A patient is considered bed-confined if he/she is:

- Unable to get up from bed without assistance;
- Unable to ambulate; and
- Unable to sit in a chair or wheelchair.

Note that the term "bed confined" is **not** synonymous with "bed rest" or "nonambulatory."

CENTERS FOR MEDICARE AND MEDICAID SERVICES (CMS)

As of 6/9/2025, the following Centers for Medicare & Medicaid (CMS) guidance was identified which addresses ambulance services:

- Medicare Claims Processing Manual, Chapter 15 Ambulance
- Medicare Benefit Policy Manual, Chapter 10 Ambulance Services
- Centers for Medicare & Medicaid Services (CMS). Ambulance Fee Schedule.
- Ambulance Fee Schedule Medical Conditions List and Transportation Indicators
- Ambulance Fee Schedule Medical Conditions List (NOTE: According to the "Medical Conditions List and Transportation Indicators" reference above, this list was last updated in February 2007, and therefore, includes ICD-9 codes, rather than the ICD-10 codes used today. For ICD-10 codes, see next entry.)
- ICD-10-CM Cross Walk for Medical Conditions List
- Noridian J-F web page for Ambulance Billing
- Noridian J-F web page for Ambulance Origin/Destination Modifiers
- Noridian J-F web page for Place of Service.
- 42 CFR 410.40(e)(3).

The above policy statements are consistent with the CMS guidance regarding ambulance services and billing. Member benefit language and provider contracts supersede reimbursement policy.

Oregon Health Plan (OHP)/Medicaid references include, but may not be limited to, the following:

- OAR 410-141-3945. Transportation: Ground and Air Ambulance Transports
- Oregon Health Authority (OHA). Medical Transportation Services Provider Guide.

BILLING AND CODING GUIDELINES

GENERAL

HCPCS Codes for Ambulance Services³

Ambulance services are reported using available HCPCS codes which represent the transportation service provided, and the vehicle-type that was used. **Table 1** includes a list of HCPCS codes applicable to ambulance and transportation services.

Medicare bundles into the base rate payment all items and services furnished within the ambulance benefit. This eliminates billing on an itemized basis for any items and services related to the ambulance service (for example, oxygen, drugs, extra attendants, and EKG testing). Therefore, only the base rate code and the mileage code are used for billing purposes, as all services and supplies rendered during the course of the transport are included in the transport payment.

Table 1: Comprehensive List of Ambulance HCPCS Codes

Note: Inclusion of a code on this list does **NOT** imply guaranteed coverage of that code or the service/item it represents.

Ambulance HCPCS			
HCPCS	Description		
A0021	Ambulance service, outside state per mile, transport (Medicaid only)		
A0080	Non-emergency transportation, per mile - vehicle provided by volunteer (individual or organization), with no vested interest		
A0090	Non-emergency transportation, per mile - vehicle provided by individual (family member, self, neighbor) with vested interest		
A0100	Non-emergency transportation; taxi		
A0110	Non-emergency transportation and bus, intra or inter state carrier		
A0120	Non-emergency transportation: mini-bus, mountain area transports, or other transportation systems		
A0130	Non-emergency transportation: wheelchair van		
A0140	Non-emergency transportation and air travel (private or commercial) intra or inter state		
A0160	Non-emergency transportation: per mile - case worker or social worker		
A0170	Transportation ancillary: parking fees, tolls, other		
A0180	Non-emergency transportation: ancillary: lodging-recipient		
A0190	Non-emergency transportation: ancillary: meals-recipient		
A0200	Non-emergency transportation: ancillary: lodging escort		
A0210	Non-emergency transportation: ancillary: meals-escort		
A0225	Ambulance service, neonatal transport, base rate, emergency transport, one way		
A0380	BLS mileage (per mile)		
A0382	Bls routine disposable supplies		

	BLS specialized service disposable supplies; defibrillation (used by ALS		
A0384	ambulances and BLS ambulances in jurisdictions where defibrillation is		
	permitted in BLS ambulances)		
A0390	ALS mileage (per mile)		
A0392	ALS specialized service disposable supplies; defibrillation (to be used only in		
	jurisdictions where defibrillation cannot be performed in BLS ambulances)		
A0394	ALS specialized service disposable supplies; IV drug therapy		
A0396	ALS specialized service disposable supplies; esophageal intubation		
A0398	ALS routine disposable supplies		
A0420	Ambulance waiting time (ALS or BLS), one half (1/2) hour increments		
A0422	Ambulance (ALS or BLS) oxygen and oxygen supplies, life sustaining situation		
40424	Extra ambulance attendant, ground (ALS or BLS) or air (fixed or rotary winged);		
A0424	(requires medical review)		
A0425	Ground mileage, per statute mile		
	Ambulance service, Advanced Life Support (ALS), non-emergency transport,		
A0426	Level 1		
A0427	Ambulance service, ALS, emergency transport, Level 1		
A0428	Ambulance service, Basic Life Support (BLS), non-emergency transport		
A0429	Ambulance service, Basic life support (BLS), emergency transport		
A0430	Ambulance service, conventional air services, transport, one way, (fixed wing)		
A0431	Ambulance service, conventional air services, transport, one way (rotary wing)		
710 10 1	Paramedic ALS intercept (PI), rural area transport furnished by a volunteer		
A0432	ambulance company, which is prohibited by state law from billing third party		
710132			
A0433	Ambulance service, advanced life support, level 2 (ALS2)		
A0434	Specialty care transport (SCT)		
A0435	Fixed wing air mileage, per statute mile		
A0436	Rotary wing air mileage, per statute mile		
710130	Noncovered ambulance mileage, per mile (e.g., for miles traveled beyond		
A0888	closest appropriate facility)		
A0998	Ambulance response and treatment, no transport		
A0999	Unlisted ambulance service		
A0333	Paramedic intercept, non-hospital-based ALS service (non-voluntary), non-		
S0207	transport		
S0208	Paramedic intercept, hospital-based als service (non-voluntary), non-transport		
S0208	Wheelchair van, mileage, per mile		
S0215	Non-emergency transportation; mileage, per mile		
S9960	Ambulance service, conventional air service, nonemergency transport, one way (fixed wing)		
S9961	Ambulance service, conventional air service, nonemergency transport, one way		
T2004	(rotary wing)		
T2001	Non-emergency transportation; patient attendant/escort		
T2002	Non-emergency transportation; per diem		
T2003	Non-emergency transportation; encounter/trip		
T2004	Non-emergency transport; commercial carrier, multi-pass		
T2005	Non-emergency transportation; stretcher van		
T2007	Transportation waiting time, air ambulance and non-emergency vehicle, one-half (1/2) hour increments		
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HCPCS S-Codes

Like all S-codes, the *National Physician Fee Schedule Relative Value File (NPFSRVF)*, which is published by Medicare⁴, indicates HCPCS codes S0207-S0209, S0215, and S9960-S9961 have all been assigned a Status Indicator of "I." This is defined as "Not valid for Medicare purposes." In addition, all S-codes codes, including S-codes for ambulance or transportation services, are not recognized as valid codes for claim submission as indicated in the relevant Company Coding Policy (*HCPCS S-Codes and H-Codes*, 22.0). Providers need to use alternate available CPT or HCPCS codes to report for the service. If no specific CPT or HCPCS code is available, then an unlisted code may be used. Note that unlisted codes are reviewed for medical necessity, correct coding, and pricing at the claim level. Thus, if an unlisted code is billed related to a non-covered service, it will also be denied.

Origin and Destination Modifiers⁵

For ambulance service claims, an origin and destination modifier must be reported for each ambulance trip provided. (Medicare Claims Processing Manual, Ch. 15, 30.A)

These modifiers are created by combining two alpha characters together. Each alpha character, with the exception of "X", represents an origin code or a destination code. The pair of alpha codes creates one modifier. The first position alpha code equals origin; the second position alpha code equals destination.

Table 2: Ambulance Origin and Destination Alpha Characters and Descriptions

Primary Ambulance Modifiers		
Alpha	Description	Notes
D	Diagnostic or therapeutic site other than P or H when these	Origin and destination
	are used as origin codes	
Е	Residential, domiciliary, custodial facility	Origin and destination
G	Hospital based ESRD facility	Origin and destination
Н	Hospital	Origin and destination
	Site of transfer (e.g. airport or helicopter pad) between	Origin and destination
<u>'</u>	modes of ambulance transport	
J	Freestanding ESRD facility	Origin and destination
N	Skilled nursing facility	Origin and destination
Р	Physician's office	Origin and destination
R	Residence	Origin and destination
S	Scene of accident or acute event	Origin and destination
Х	Intermediate stop at physician's office on way to hospital	Destination only
^	(destination code only)	

Some modifier combinations may represent a potentially non-covered transport. These include DD, DE, DP, DR, DS, ED, EE, EP, ER, ES, GD, GG, GI, GJ, GP, GS, GX, HD, HG, HP, HS, HX, ID, IE, IJ, IN, IP, IR, IS, IX, JD, JG, JI, JJ, JP, JS, JX, NI, NN, NP, NS, PD, PE, PG, PJ, PN, PP, PR, PS, PX, RD, RE, RP, RR, RS, SD, SE, SG, SJ, SN, SP, SR, SS, XD, XE, XG, XJ, XN, XP, XR, XS, XX.

Table 3 includes additional modifiers which can also be used to relay information regarding the ambulance transport.

Table 3: Additional Ambulance Modifiers

Additional Ambulance Modifiers			
Modifier	Description	Notes	
GM	Multiple patients on one trip	Use in addition to origin & destination modifiers	
QL	Patient pronounced dead after ambulance called	Origin/destination modifiers not required	
QM	Ambulance service provided under arrangement by a provider of services	Use in addition to origin & destination modifiers	
QN	Ambulance service furnished directly by a provider of services	Use in addition to origin & destination modifiers	
тк	Extra patient or passenger, non-ambulance	Use in addition to origin & destination modifiers	
TQ	Basic life support transport by a volunteer ambulance provider	Use in addition to origin & destination modifiers	

Ambulance Place of Service Codes⁶

For all claims, a place of service code must be reported for each ambulance service, and it must align with the ambulance service billed.

Table 4: Ambulance Place of Service Codes

Place of Service (POS) Codes				
POS Code	Description	Notes		
41	Ambulance – Land	A land vehicle specifically designed, equipped and staffed for lifesaving and transporting the sick or injured.		
42	Ambulance – Air or Water	An air or water vehicle specifically designed, equipped and staffed for lifesaving and transporting the sick or injured.		
99	Other Place of Service	Other place of service not identified above. May be used for non-transport ambulance claims.		

Reimbursement for Deceased Members

Payment for ambulance service claims for deceased members will be based on whether or not a transport was medically reasonable and necessary and when the individual was officially pronounced dead.⁷

CROSS REFERENCES

Medical Policies

Company: <u>Ambulance Transport</u>, MP118
 Medicare: <u>Ambulance Transport</u>, MP386

Coding Policies

HCPCS S-Codes and H-Code, CP22.0

The full Company portfolio of current Reimbursement Policies is available online and can be accessed here.

REFERENCES

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POLICY REVISION HISTORY

Date	Revision Summary
8/4/2025	New reimbursement policy