

# THE MONTANA LEGISLATURE

## ECONOMIC AFFAIRS INTERIM COMMITTEE

### 2015-2016

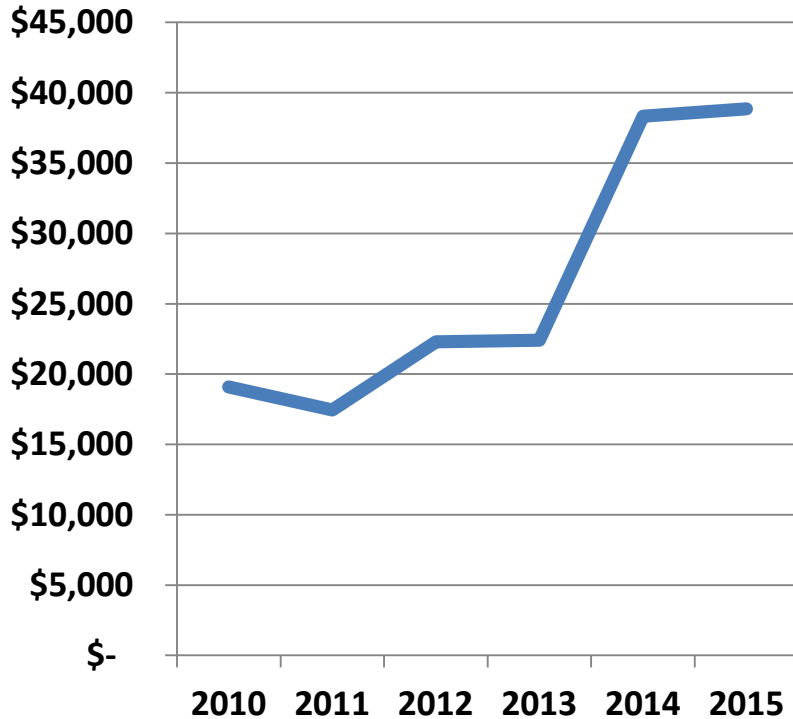
Discussion on Air Ambulance Coverage  
February 4, 2016

# PRESENTATION OUTLINE

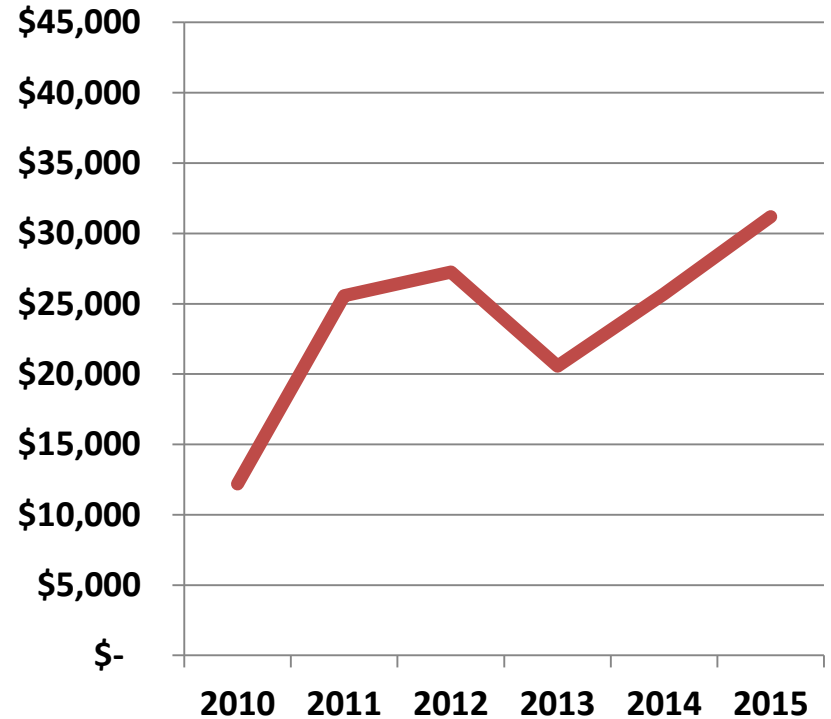
- **History and context**
- **Financial analyses**
- **Communications**
- **Recommendations**

# HISTORY & CONTEXT

## Average Fixed Wing OON



## Average Rotary OON



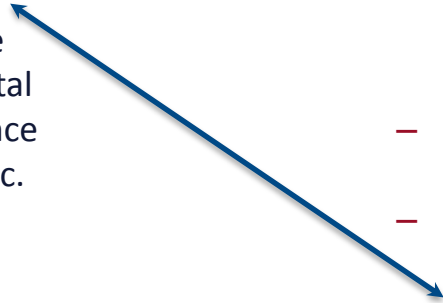
# HISTORY & CONTEXT

- **Allegiance Provider Direct In-Network Air Ambulance Listing 2010**

- A.L.E.R.T. Air Ambulance
  - Kalispell Regional Medical Center
- H.E.L.P. Flight
  - St. Vincent Healthcare
- Life Flight
  - St. Patrick Hospital
- MedFlight Air Ambulance
  - Billings Clinic Hospital
- Mercy Flight Air Ambulance
  - Benefis Hospitals Inc.

- **Out of network providers (for Allegiance & Cigna) who operate in Montana**

- Airlift Northwest
  - Seattle, WA – 2007 (for transports to Seattle Children’s & Harborview)
- Rocky Mountain Holdings/Care Flight
  - Missoula, MT – Spring 2005
- Summit
  - Bozeman, MT – January **2012** ←
  - Helena, MT – February **2014** ←
- Eagle Med
  - Butte, MT – November **2014** ←
- Life Flight
  - Butte, MT – January **2014** ←
- Northwest MedStar
  - Missoula, MT – April **2014** ←



# HISTORY & CONTEXT

- **Allegiance Provider Direct In-Network Air Ambulance Listing 2010**

- Facility Based Providers

- A.L.E.R.T. Air Ambulance – Kalispell Regional Medical Center
- H.E.L.P. Flight – St. Vincent Healthcare
- Life Flight – St. Patrick Hospital
- MedFlight Air Ambulance – Billings Clinic Hospital
- Mercy Flight Air Ambulance – Benefis Hospitals Inc.

- **Allegiance Provider Direct In-Network Air Ambulance Listing 2015**

- Facility Based Providers

- A.L.E.R.T. Air Ambulance – Kalispell Regional Medical Center
- H.E.L.P. Flight – St. Vincent Healthcare
- MedFlight Air Ambulance – Billings Clinic Hospital
- Mercy Flight Air Ambulance – Benefis Hospitals Inc.
- North East Montana STAT Air Ambulance Co-operative – Frances Mahon Deaconess Hospital, Phillips County Hospital & North East Montana Health Services

- Independently Operated Providers

- Montana Medical Transport
- American Aerovac – National Provider
- AMR Air Ambulance – National Provider
- Bismark Air Medical, LLC
- Valley Med Flight, Inc.

***Any provider willing to accept 250% of Medicare or less without balance billing to the patient.***

# HISTORY & CONTEXT

- **Responsibilities of plan sponsor per ERISA**

29 U.S. Code § 1104 – Fiduciary duties

(a) Prudent man standard of care

(1) Subject to sections 1103(c) and (d), 1342, and 1344 of this title, a fiduciary shall discharge his duties with respect to a plan solely in the interest of the participants and beneficiaries and—

(A) for the exclusive purpose of:

(i) providing benefits to participants and their beneficiaries; and

(ii) defraying reasonable expenses of administering the plan;

(B) with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent man acting in a like capacity and familiar with such matters would use in the conduct of an enterprise of a like character and with like aims;

# FINANCIAL ANALYSES

- Sample of out of network flights – facility to facility

| Provider                | Airlift Northwest | Airlift Northwest | EagleMed LLC     | EagleMed LLC      | Life Flight Network LLC | Life Flight Network LLC | Life Flight Network LLC | Northwest MedStar | Northwest MedStar | Northwest MedStar |
|-------------------------|-------------------|-------------------|------------------|-------------------|-------------------------|-------------------------|-------------------------|-------------------|-------------------|-------------------|
| <b>Aircraft Type</b>    | Fixed             | Fixed             | Rotary           | Rotary            | Fixed                   | Rotary                  | Rotary                  | Fixed             | Rotary            | Fixed             |
| <b>From</b>             | <b>Bozeman</b>    | <b>Havre</b>      | <b>Butte</b>     | <b>Deer Lodge</b> | <b>Butte</b>            | <b>Sheridan</b>         | <b>Anaconda</b>         | <b>Missoula</b>   | <b>Deer Lodge</b> | <b>Missoula</b>   |
| <b>To</b>               | <b>Seattle</b>    | <b>Seattle</b>    | <b>Missoula</b>  | <b>Missoula</b>   | <b>Billings</b>         | <b>Billings</b>         | <b>Spokane</b>          | <b>Seattle</b>    | <b>Missoula</b>   | <b>Spokane</b>    |
| <b>Billed Base</b>      | \$ 15,000         | \$ 15,000         | \$ 15,525        | \$ 15,525         | \$ 18,134               | \$ 19,400               | \$ 19,400               | \$ 13,116         | \$ 15,246         | \$ 13,116         |
| <b>Billed Mileage</b>   | \$ 53,392         | \$ 56,776         | \$ 18,379        | \$ 14,684         | \$ 34,340               | \$ 38,400               | \$ 48,800               | \$ 45,581         | \$ 10,648         | \$ 18,497         |
| <b>Miscellaneous</b>    | \$ 4,680          | \$ -              | \$ 1,250         | \$ 993            | \$ -                    | \$ -                    | \$ -                    | \$ 608            | \$ 2,574          | \$ 652            |
| <b>Total Billed</b>     | <b>\$ 73,072</b>  | <b>\$ 71,776</b>  | <b>\$ 35,154</b> | <b>\$ 31,202</b>  | <b>\$ 52,474</b>        | <b>\$ 57,800</b>        | <b>\$ 68,200</b>        | <b>\$ 59,305</b>  | <b>\$ 28,468</b>  | <b>\$ 32,265</b>  |
| <b>Medicare Base</b>    | \$ 4,445          | \$ 4,445          | \$ 5,245         | \$ 5,245          | \$ 4,511                | \$ 5,245                | \$ 5,245                | \$ 4,511          | \$ 5,245          | \$ 4,511          |
| <b>Medicare Mileage</b> | \$ 7,156          | \$ 7,610          | \$ 3,347         | \$ 2,459          | \$ 2,585                | \$ 6,558                | \$ 8,334                | \$ 5,297          | \$ 2,732          | \$ 2,150          |
| <b>Total Medicare</b>   | <b>\$ 11,601</b>  | <b>\$ 12,055</b>  | <b>\$ 8,592</b>  | <b>\$ 7,704</b>   | <b>\$ 7,096</b>         | <b>\$ 11,803</b>        | <b>\$ 13,579</b>        | <b>\$ 9,808</b>   | <b>\$ 7,978</b>   | <b>\$ 6,661</b>   |
| <b>% of Medicare</b>    | <b>630%</b>       | <b>595%</b>       | <b>409%</b>      | <b>405%</b>       | <b>739%</b>             | <b>490%</b>             | <b>502%</b>             | <b>605%</b>       | <b>357%</b>       | <b>484%</b>       |
| <b>Allowed per Plan</b> | \$ 29,002         | \$ 30,138         | \$ 21,481        | \$ 19,261         | \$ 17,740               | \$ 29,507               | \$ 33,947               | \$ 24,521         | \$ 19,944         | \$ 16,652         |
| <b>% of Medicare</b>    | 250%              | 250%              | 250%             | 250%              | 250%                    | 250%                    | 250%                    | 250%              | 250%              | 250%              |
| <b>Balance Bill</b>     | <b>\$44,070</b>   | <b>\$41,638</b>   | <b>\$13,673</b>  | <b>\$11,941</b>   | <b>\$34,734</b>         | <b>\$28,293</b>         | <b>\$34,253</b>         | <b>\$34,784</b>   | <b>\$8,525</b>    | <b>\$15,613</b>   |

# FINANCIAL ANALYSES

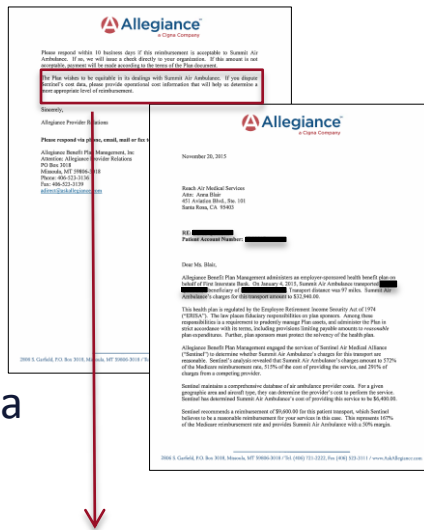
- Sample of out of network flights – facility to facility

| Provider              | Reach Medical Services | Reach Medical Services | Reach Medical Services | Rocky Mountain Holdings | Rocky Mountain Holdings | Rocky Mountain Holdings | Summit Air Ambulance LLC | Summit Air Ambulance LLC | Summit Air Ambulance LLC | TOTAL             |
|-----------------------|------------------------|------------------------|------------------------|-------------------------|-------------------------|-------------------------|--------------------------|--------------------------|--------------------------|-------------------|
| Aircraft Type         | Fixed                  | Rotary                 | Rotary                 | Fixed                   | Rotary                  | Fixed                   | Fixed                    | Fixed                    | Rotary                   |                   |
| From                  | Bozeman                | Bozeman                | Butte                  | Missoula                | Butte                   | Bozeman                 | Butte                    | Bozeman                  | Bozeman                  |                   |
| To                    | Billings               | Billings               | Bozeman                | SLC                     | Missoula                | Billings                | Denver                   | Billings                 | Billings                 |                   |
| Billed Base           | \$ 15,965              | \$ 15,965              | \$ 16,078              | \$ 14,595               | \$ 16,427               | \$ 16,746               | \$ 12,500                | \$ 15,965                | \$ 15,965                | \$ 299,668        |
| Billed Mileage        | \$ 23,450              | \$ 21,525              | \$ 13,650              | \$ 25,404               | \$ 20,477               | \$ 23,253               | \$ 72,453                | \$ 24,500                | \$ 21,875                | \$ 586,085        |
| Miscellaneous         | \$ -                   | \$ -                   | \$ -                   | \$ -                    | \$ -                    | \$ -                    | \$ -                     | \$ -                     | \$ -                     | \$ 10,757         |
| <b>Total Billed</b>   | <b>\$ 39,415</b>       | <b>\$ 37,490</b>       | <b>\$ 29,728</b>       | <b>\$ 39,999</b>        | <b>\$ 36,904</b>        | <b>\$ 39,999</b>        | <b>\$ 84,953</b>         | <b>\$ 40,465</b>         | <b>\$ 37,840</b>         | <b>\$ 896,509</b> |
| Medicare Base         | \$ 4,511               | \$ 5,245               | \$ 5,245               | \$ 4,366                | \$ 5,076                | \$ 4,401                | \$ 4,445                 | \$ 4,511                 | \$ 5,245                 | \$ 91,694         |
| Medicare Mileage      | \$ 1,715               | \$ 4,201               | \$ 2,664               | \$ 4,690                | \$ 3,238                | \$ 1,572                | \$ 7,673                 | \$ 1,791                 | \$ 4,269                 | \$ 80,043         |
| <b>Total Medicare</b> | <b>\$ 6,226</b>        | <b>\$ 9,446</b>        | <b>\$ 7,909</b>        | <b>\$ 9,056</b>         | <b>\$ 8,314</b>         | <b>\$ 5,973</b>         | <b>\$ 12,118</b>         | <b>\$ 6,303</b>          | <b>\$ 9,515</b>          | <b>\$ 171,737</b> |
| % of Medicare         | <b>633%</b>            | <b>397%</b>            | <b>376%</b>            | <b>442%</b>             | <b>444%</b>             | <b>670%</b>             | <b>701%</b>              | <b>642%</b>              | <b>398%</b>              | <b>522%</b>       |
| Allowed per Plan      | \$ 15,565              | \$ 23,616              | \$ 19,773              | \$ 22,640               | \$ 20,786               | \$ 14,933               | \$ 30,295                | \$ 15,757                | \$ 23,786                | \$ 429,342        |
| % of Medicare         | 250%                   | 250%                   | 250%                   | 250%                    | 250%                    | 250%                    | 250%                     | 250%                     | 250%                     | 250%              |
| <b>Balance Bill</b>   | <b>\$23,850</b>        | <b>\$13,875</b>        | <b>\$9,954</b>         | <b>\$17,359</b>         | <b>\$16,119</b>         | <b>\$25,066</b>         | <b>\$54,658</b>          | <b>\$24,708</b>          | <b>\$14,054</b>          | <b>\$467,166</b>  |

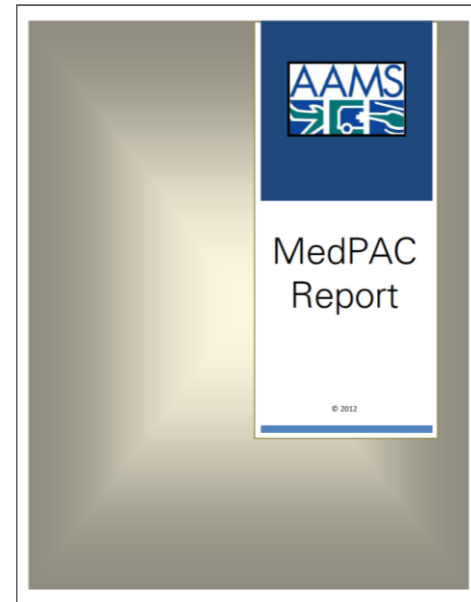


# FINANCIAL ANALYSES

- **Determination of “reasonable” and basis of data**
  - What other providers are accepting as payment in full
    - From current in-network providers
  - Source data
    - From Sentinel Air Medical Alliance
    - 2012 MedPAC study
    - FAA study
  - Multiple of Medicare
  - Willingness to accept direct cost data



**The Plan wishes to be equitable in its dealings with Summit Air Ambulance. If you dispute Sentinel's cost data, please provide operational cost information that will help us determine a more appropriate level of reimbursement.**



ASSOCIATION OF AIR MEDICAL SERVICES

# FINANCIAL ANALYSES

- **Association of Air Medical Services (AAMS) 2012 MedPAC Report**
  - The \$5,700 average Medicare reimbursement is a mix of both rural and urban rates.
  - The relative percent mix of Medicare transports can vary between 15-30%+ of total transports.
  - The relative percent mix of Medicare transports is increasing by 7-22% year on year and will continue to do so as the population of boomers continue to grow in the Medicare pool.
  - ➔ – The cumulative loss on Medicare Transports averages 10% of total program costs, which money could be invested in safety initiatives and reduce the amount of costs shifted to commercial insurance programs.

## Notes:

1. *Allegiance uses Rural Medicare rates in all its Montana Air Ambulance price determinations*
2. *Rural Medicare rates are 150% of urban Medicare rates for air ambulance*

# FINANCIAL ANALYSES

- Calculation of required cost shifting

## Assumptions

|                                    |       |     |     |
|------------------------------------|-------|-----|-----|
| Medicare as a % of total revenue   | $M_W$ | 30% | 40% |
| Loss on Medicare business          | $M_L$ | 10% | 25% |
| Commercial as a % of total Revenue | $C_W$ | 70% | 60% |
| Assumed margin                     | $D_M$ | 20% | 20% |
| Medicare as a % of Cost            | $M_C$ | 90% | 75% |



## Required Revenue from Commercial as a Multiple of Medicare

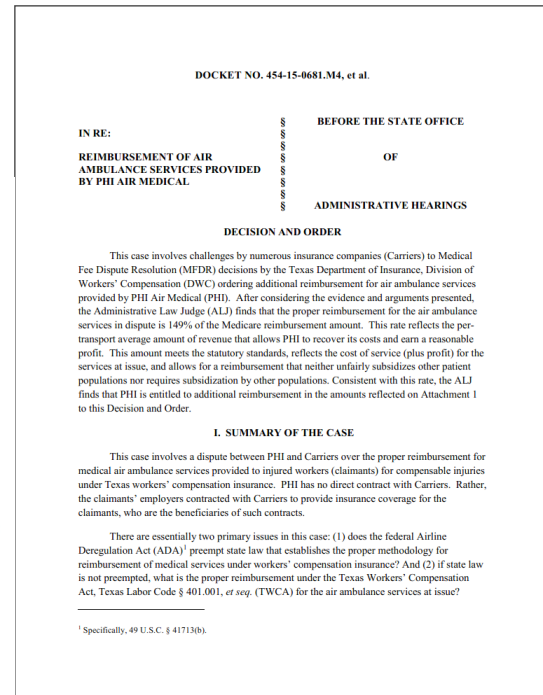
|       |      |      |
|-------|------|------|
| $R_R$ | 133% | 150% |
|-------|------|------|

$$R_R = [(1 + D_M) - (M_W \times M_C)] / C_W$$

# FINANCIAL ANALYSES

- **Workers Compensation case in Texas**
  - Signed September 8, 2015

This case involves challenges by numerous insurance companies (Carriers) to Medical Fee Dispute Resolution (MFDR) decisions by the Texas Department of Insurance, Division of Workers' Compensation (DWC) ordering additional reimbursement for air ambulance services provided by PHI Air Medical (PHI). After considering the evidence and arguments presented, the Administrative Law Judge (ALJ) finds that the proper reimbursement for the air ambulance services in dispute is 149% of the Medicare reimbursement amount. This rate reflects the per-transport average amount of revenue that allows PHI to recover its costs and earn a reasonable profit. This amount meets the statutory standards, reflects the cost of service (plus profit) for the services at issue, and allows for a reimbursement that neither unfairly subsidizes other patient populations nor requires subsidization by other populations. Consistent with this rate, the ALJ finds that PHI is entitled to additional reimbursement in the amounts reflected on Attachment 1 to this Decision and Order.



Docket No. 454-15-0681.M4, et al.

# COMMUNICATIONS

| Allegiance In-Network Providers | Phone Number | Fixed Wing | Rotary Wing | NICU Transfers | Based out of:                    |
|---------------------------------|--------------|------------|-------------|----------------|----------------------------------|
| Benefis Healthcare              | 800-972-4000 | X          | X           | X              | Great Falls, MT                  |
| Billings Clinic Hospital        | 800-325-1774 | X          |             | X              | Billings, MT                     |
| Bismark Air Medical, LLC        | 800-441-1310 | X          |             |                | Bismark, ND                      |
| Kalispell Regional Healthcare   | 866-302-9767 | X          | X           | X              | Kalispell, MT                    |
| Montana Medical Transport       | 406-442-2190 | X          |             |                | Helena, MT                       |
| NE Stat Air                     | 800-992-7828 | X          |             |                | Glasgow, MT                      |
| St. Vincent's Healthcare        | 800-538-4357 | X          | X           | X              | Billings, MT                     |
| Valley Med Flight, Inc.         | 800-828-0168 | X          | X           |                | Sidney, MT & Williston, ND       |
| American Aerovac Inc.           | 800-423-5993 | X          | X           |                | For transfer any place in the US |
| AMR Air Ambulance               | 800-424-7060 | X          |             | X              | For transfer any place in the US |

# COMMUNICATIONS

## To facilities



**Allegiance** NEWS AND INFORMATION FOR ALLEGiance PROVIDER DIRECT, LLC PROVIDERS  
**Provider Direct**

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**ICD-10: OCTOBER 2015**

The transition to ICD-10 compliance deadline of October 1, 2015 is federally mandated. We will begin requiring ICD-10 codes on October 1, 2015 in compliance with the mandate.

- **Claims with ICD-9 codes:** Claims submitted with dates of service or discharge prior to the compliance date of October 1, 2015 will be accepted with ICD-9 codes.
- **Claims with ICD-10 codes:** Claims submitted with dates of service or discharge on or after October 1, 2015 will be accepted with ICD-10 codes. Our claim processing systems will not accept ICD-10 codes for dates of service prior to October 1, 2015.
- **Mixed-coded claims:** Claims with ICD-9 and ICD-10 codes on the same claim will not be accepted.
- **Claims that cross the compliance date:** Claims must be split so that all ICD-9 codes remain on one claim with dates of service through September 30, 2015, and all ICD-10 codes are on a separate claim with dates of service on or after October 1, 2015.
- **Inpatient hospital claims:** There is an exception for these claims. They should be coded based on the discharge date. Use ICD-9 codes if the discharge date is before October 1, 2015, and ICD-10 codes if the discharge date is on or after October 1, 2015.



**Credentialing Update**

**Effective April 1, 2016** Allegiance Benefit Plan Management, Inc. groups will require credentialing of in-network providers. Providers who have not completed credentialing with Allegiance will be considered out-of-network for all Allegiance and Cigna members.

**Effective April 1, 2016** Allegiance Provider Direct will require providers to credential through CAQH. CAQH ProView is available to providers free of charge.

CAQH, the online tool for collection of Allegiance Provider Direct provider credentialing information, has launched the next generation of the Universal Provider Datasource (UPD), now called CAQH ProView. CAQH established CAQH ProView Provider Transition Support Center to help providers and practice managers with the transition. If you need assistance completing your application or have any questions, please email [proview@caqh.org](mailto:proview@caqh.org) or call 844-259-5347.

For communication and questions regarding credentialing for Allegiance and Cigna health plans, please email:

[Credentialing@AskAllegiance.com](mailto:Credentialing@AskAllegiance.com)

 [www.askallegiance.com](http://www.askallegiance.com)

### Air Ambulance

Out-of-network air ambulance transportation is very costly with most air transport companies charging 500%-1200% of what Medicare would allow for the same service. To ensure that Montana patients, family members, friends, and members of the community are not left with tens of thousands of dollars in balance billing, we need your help.

#### THE SITUATION:

• When medically necessary transportation is scheduled and the patient is transported without utilizing available in-network air transport, these patients and their families are left at the mercy of out-of-network air transport companies' exorbitantly billed charges.

• Benefits will cover up to a generous amount allowed by in-network air transport, but these patients are then billed any remainder, with many owing \$20,000 - \$50,000 in charges after insurance has already reimbursed the provider.

#### THE SOLUTION:

• If you are an in-network facility and are using your in-network transport company, then payment for the member should not be an issue.

• If your flight is not available or if you do not support an air transport service, please see below:

| Allegiance In-Network Providers | Phone Number | Fixed Wing | Rotary Wing | NICU Transfers | Based out of:                    |
|---------------------------------|--------------|------------|-------------|----------------|----------------------------------|
| Benefits Healthcare             | 800-972-4000 | X          | X           | X              | Great Falls, MT                  |
| Billings Clinic Hospital        | 800-325-1774 | X          |             | X              | Billings, MT                     |
| Bismarck Air Medical, LLC       | 800-441-1310 | X          |             |                | Bismarck, ND                     |
| Kalispell Regional Healthcare   | 866-302-9767 | X          | X           | X              | Kalispell, MT                    |
| Montana Medical Transport       | 406-442-2190 | X          |             |                | Helena, MT                       |
| NE Stat Air                     | 800-992-7828 | X          |             |                | Billings, MT                     |
| St. Vincent's Healthcare        | 800-538-4357 | X          | X           | X              | Billings, MT                     |
| Valley Med Flight, Inc.         | 800-828-0168 | X          | X           |                | Sidney, MT & Williston, ND       |
| American Aerovac, Inc.          | 800-423-5993 | X          | X           |                | For transfer any place in the US |
| AMR Air Ambulance               | 800-424-7960 | X          |             | X              | For transfer any place in the US |

Allegiance Provider Relations: [adirect@askallegiance.com](mailto:adirect@askallegiance.com) • 406-523-3136

### Allegiance Provider Direct Website

[www.AllegianceProviderDirect.com](http://www.AllegianceProviderDirect.com)

Allegiance Provider Direct website offers services like benefits verification, update forms and applications, and recent provider news and information in an accessible format. We encourage our providers to check out the new [www.AskAllegiance.com](http://www.AskAllegiance.com) and explore the services available there including the following:

- Forms for updating address, billing, and provider information
  - Credentialing information — for Allegiance credentialing questions please email [Credentialing@AskAllegiance.com](mailto:Credentialing@AskAllegiance.com)
  - Useful FAQs and additional documentation regarding Cigna members
- For Allegiance provider questions please email [Adirect@askallegiance.com](mailto:Adirect@askallegiance.com)



### Working with Cigna Members Who Access Allegiance

Cigna claims processing summary available online at: [www.AllegianceProviderDirect.com](http://www.AllegianceProviderDirect.com)

#### Contact Information

Claims processing, status, and payment information: (800) 882-4462  
[www.cignaforhcp.com](http://www.cignaforhcp.com)

Allowable charge and contract information: (406) 523-3136  
[adirect@askallegiance.com](mailto:adirect@askallegiance.com)

#### Questions!

[www.AllegianceProviderDirect.com](http://www.AllegianceProviderDirect.com) • [adirect@askallegiance.com](mailto:adirect@askallegiance.com) • [credentialing@askallegiance.com](mailto:credentialing@askallegiance.com)

### No Cost Pay-Plus 835/ACH – Action Required

Allegiance Benefit Plan Management, Inc. issues electronic payments and remittance through our partner, Pay-Plus Solutions, a CAQH CORE® certified vendor for delivery of Electronic Funds Transfer (EFT) and Electronic Remittance Advices (ERAs or 835s). Because of your relationship with Allegiance, you have the option of enrolling with Pay-Plus Solutions Inc. (PPS) for ACH at no cost to your practice or facility. This enrollment will allow you to receive both:

- Allegiance's claim payments via ACH, directly deposited into your bank account
- CORE compliant 835s

To facilitate this transition, please create your provider profile at <https://web.ppsonline.com/PayPlusProvider/Registration> to initiate the process. Your organization will obtain a unique registration code to set up your account from the PPS website. Once you have received this registration code, you must notify PPS by submitting an email to [PPS\\_Allegiance\\_DirectZero@ppsonline.com](mailto:PPS_Allegiance_DirectZero@ppsonline.com) with your code. PPS will continue the process and notify you via email when you are able to finalize the process with your banking information to receive EFTs. This is a **LIMITED TIME OFFER** for our Allegiance Provider Direct member. It is imperative that your practice complete the enrollment process with will expire soon to receive receipt of EFT/835s without charge.

The no cost offer will expire soon.

If you are receiving virtual card payments from Pay-Plus Solutions at this time, and wish to continue receiving these transactions, this option is still available.

Technical support and other inquiries should contact Pay-Plus Solutions directly.

Pay-Plus Solutions • 877-828-8770 • [info@ppsonline.com](mailto:info@ppsonline.com)



### Allegiance Benefit Plan Management, Inc. Medical Policy Update:

Tomosynthesis CPT code 77063 and G0279 have been reclassified as covered services for Allegiance Benefit Plan Management, Inc.

#### Effective August 1, 2015:

Tomosynthesis CPT code 77063 and G0279 have been reclassified as covered services for Allegiance Benefit Plan Management, Inc.



# RECOMMENDATIONS

- **For Medical Transport Companies**
  - Disclose pricing to facilities
  - Disclose ownership and/or any financial or contractual relationships with the transferring or receiving facilities to participants as well as payers and employers
  - Disclose in / out of network status for patient transport
- **For Facilities Calling for Medical Transport**
  - Disclose to patients and payers any incentives / promises from transport companies
  - Prioritize call recommendations by medical necessity and financial impact to the patients
- **For Payers and Employers**
  - Communicate in-network transport companies to facilities
  - Accept any willing provider into network at network rates
  - Report total and average utilization, base rate, and mileage rate to transport companies, facilities and patients