

*A Newsletter
From the Desk
of
Rick Martin*

Feb 19, 2013



COMSTAR

Ambulance Billing Service

HHS Issues Final Rule Making Significant Changes to HIPAA Rules

On January 17, 2013, the Department of Health and Human Services (“HHS”) released a Final Rule making significant changes to the HIPAA Privacy, Security and Enforcement Rules. The following is a link to the January 17th HHS news release and full info on the changes:

<http://www.hhs.gov/news/press/2013pres/01/20130117b.html>

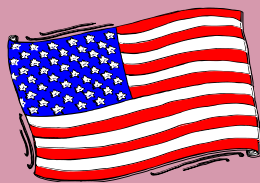
The following is a summary of items that immediately impact your service:

Business Associate Agreements

Under HIPAA, your service is required to have a Business Associate Agreement (BAA) with any party with whom it shares or gives access to its patient’s PHI. Comstar meets the definition of a Business Associate of your service under HIPAA. The final rule issued on January 17th includes additional language requirements likely not found in your current BAA. To assist you with your compliance, With advice from our EMS attorney. Comstar has produced a generic BAA for your use. The follow is a link this BAA: http://www.comstarbilling.com/Documents/ba_agreement.pdf

Please print, fill in your service name, the date, sign and send to me for signature. I will then e-mail you a signed copy for your files. . All clients have a responsibility to take action on this item. Please contact me anytime with questions. Please take note, having a BAA with Comstar and other BAs whom you give access to your patients PHI is a requirement of your service that requires action by your service in order to be compliant. If you prefer not to use the BAA offered by Comstar, please contact your attorney for a BAA and send it to me for my signature. The HHS published date for your services compliance with this requirement is 09/23/13.

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*America
Land of the Free
Home of the Brave*

BMM 9/11/2001

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We are on the web at
www.ComstarBilling.com

HHS Final Rule...Changes (continued)

Notice of Privacy Practices

The Final Rule made some changes to the language requirements of your services Notice of Privacy Practices (NPP). Note, all services must have an NPP and give a copy to each patient transported.

The following is a link to Comstar's NPP.

<http://www.comstarbilling.com/privacy.html>

Again, to assist you with compliance, and with the advise of our EMS attorney, Comstar has produced a generic NPP for your use . The document, in MSWord format, can be found at the following link:

https://www.comstarbilling.com/Documents/client_npp_letter.doc

For those clients who subscribe to Comstar's NPP mailing service, we've updated our forms, no action is required on your part.

**Contact me anytime
with questions on these
BAA and NPP matters.**

Rick.Martin@comstarbilling.com or 978-771-6482

***Be Nice and You'll
be happy.***

**Dick & Jackie
Martin**

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***We are what we
repeatedly do.
Excellence,
therefore, is not
an act but a habit.***

Aristotle

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Bundling Your Services Ambulance Billing Rates

Comstar is recommending that all clients that have not already done so, transition their rate structure from the traditional “a la carte” rate structure to a bundled rate structure during CY 2013.

Bundling rates will not result in higher total reimbursement of clean claims. Increasing rates could achieve this but this is not the intent of this specific advice. The intent here is to position your service well for the time if/when Obamacare becomes fully implemented and provider reimbursements begin to flow through Accountable Care Organizations, **ACO's**, (new managed care entities envision under the Obama plan).

We advise that presenting ACO's with a consistent and simplified fee structure that mirrors the current CMS fee schedule structure will position your service to attain its equitable portion of the funds allotted to the ACO for a specific (in its totality) patient care event.

Important Notes:

- 1) The specific cross walk from a la carte to bundle rates will be unique for each client as your rates and number of a la carte charges do differ. **Please contact me via e-mail, rick.martin@comstarbilling.com or my direct line, 978-771-6482, to discuss and map out your specific cross walk plan**
- 2) The cross walk process from a la carte to bundled is not intended to increase your rates but must be done thoughtfully and conservatively to ensure that your service does not unintentionally reduce its rates. Again, I can discuss crosswalk approaches that will assist you with this process when you contact me.
- 3) Your crews documentation and Comstar's coding requirements are not changed by bundling of rates.
- 4) The transition to bundled rates from a la carte rates is a “industry best practice” recommendation for the reason previously stated. It is not a mandated change.

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***Great Spirits
have always
encountered
violent opposition
from mediocre
minds.***

Albert Einstein

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Bundling Your Services Ambulance Billing Rates (continued)

A side by side example of a la carte and bundled rates is shown below. I have **arbitrarily** chosen to use values that are Boston area Medicare +100% rates rounded to near whole dollar for this example.

	a la carte	Bundled
BLS Emergency	\$773	\$883
ALS-1 Emergency	\$918	\$1,592
ALS-2 Emergency	\$1,329	\$2,505
Mileage	\$30/mi	\$30 per mile
Oxygen	\$110	included in base rate
Airway	\$267	included in base rate
IV	\$235	included in base rate
Cardiac Monitor	\$329	included in base rate
Defibrillation	\$235	included in base rate

Again, the specific cross walk from a la carte to bundled rates will be unique for each client as your rates and number of a la carte charges do differ.

Please contact me via e-mail, rick.martin@comstarbilling.com or my direct line, 978-771-6482, to discuss and map out your specific cross walk .

CT client, obviously, stick with the state mandated rates and structure.

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***Success is the
sum of small
efforts, repeated
day in and day
out.***

Robert Collier

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EMS Law Corner

Please go to our website, www.comstarbilling.com , to view the latest Sample Signature Form for use by your crews.

Many clients have or will receive a **Medicare Revalidation** Notice. The Affordable Care Act created a new set of criteria for the screening of Medicare enrollments. The purpose behind these new criteria is to identify prospective providers or suppliers that may pose a significant risk of fraud and abuse. The new criteria went into effect on March 25, 2011. In order to apply these same criteria to existing Medicare providers and suppliers, the Affordable Care Act is requiring Medicare Administrative Contractors (MACs) to revalidate the enrollment information of all providers and suppliers that were already enrolled in the Medicare program as of March 25, 2011. The current revalidation cycle will be completed by March 23, 2015. However, MACs get to set their own timetable for when they will ask specific providers to revalidate. If you receive such a notice, please contact Comstar for assistance in the compliance of this Medicare requirement.

New Hampshire Medicaid is requiring a re-enrollment for all providers enrolled within the NH Medicaid program. ACS will be taking over the NH Medicaid in the near future so Medicaid wants to verify Provider credentials prior to setting them up in the new Medicaid system. ACS expect full implementation by 2013. At that time NH providers will gain access to Electronic Funds Transfers for services rendered to Medicaid patients. NH Clients will receive a letter from NH Medicaid Title 19 program. This may be a reminder or a direct request that the provider complete the re-enrollment. Re-enrollments should be addressed immediately after receiving the letter. If you received a letter it should be sent to Comstar Attn: Tiesha Braley, Provider Relations Manager. This can be sent via facsimile to 978-356-2721 or e-mailed to tbraley@comstarbilling.com to expedite the process. We will fill in the electronic requirements on your behalf and send all signature forms for completion along with an instructional letter. Please mail the originals via U.S Postal Service Attn: Tiesha. We will submit the re-enrollment and monitor it through completion.

Any questions can be directed to Tiesha Braley directly through the means referred to above or by phone at 800-488-4351.

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***There isn't a
person
anywhere who
isn't capable of
doing more
than he thinks
he can.
Henry Ford***

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“Comstar supports your operations as well as billing.....”

Thank you for your continued business with Comstar Ambulance Billing Service. We appreciate the opportunity to provide services to you. As a company, Comstar strives to add value to all of our clients. We have the most robust array of service options, some of which you may not be aware of.

EMT Training Course -- Practical Consideration in Drafting the PCR Narrative

This course 2 hr training course is provided to upon request to all clients. The objectives of this course are: To refresh and reinforce EMT's patient care report (PCR) writing training. To refresh and reinforce EMT's knowledge of the uses and importance of the PCR. To provide insights and guidance that will result in improvement in the quality and usefulness of the PCR. Note: Though applicable to EMT's in all states, this course is approved by the Commonwealth of Massachusetts Department of Public Health, Office of Emergency Medical Services. Massachusetts certified EMT's can earn 2 (two) credit hours of continuation credit toward their Basic, Intermediate, or paramedic certification by attending this course.

Software and Data Integration Support and Services

Comstar has been using the Zoll Data Systems billing software as its billing platform since 2002. We send and receive data in an electronic and seamless manner with existing clients using Zoll's ePCR software. Comstar can also integrate seamlessly with other ePCR software vendors to the point where I guarantee that Comstar will integrate with any ePCR solution that a client may select to use. Comstar is very flexible in this manner, because we feel it is important for you, and every client to select an ePCR solution that you feel most comfortable with and best fits your needs. Our five person in-house IT staff has successfully integrated our Zoll software with the following nine (9) EPCR software solutions: AmbuPro, emsCharts, ESO Solutions, Firehouse, Healthware Solutions, ImageTrend, IMC Public Safety, PURVIS Public Safety, and Zoll Data Systems. Given Comstar's integration guarantee, this list will grow as clients select different ePCR products. In most cases, bridge programming is required to make such integration successful. Comstar's IT staff performs the bridge programming at no additional cost to Comstar's clients. They also will work with your chosen ePCR software vendor, as your technical advocate, should you have any issue with their product.

“Comstar provides a cost effective ePCR Solution.....”

Comstar has an ePCR Partnership Agreement with Zoll Data Systems. Ambulance services that desire to use the Zoll ePCR solution but do not have the capital resources to fund the cost of deployment, server setup and license purchase now have a cost effective alternative through Comstar. For more information, please contact Jeff Tassi immediately at 800-488-4351 or JTassi@comstarbilling.com. Jeff is prepared to demonstrate the Zoll ePCR product, discuss Comstar's capabilities to provide the web hosted solution, present a full service outline and discuss pricing.