



July 20, 2023

**Office of Insurance Commissioner (OIC)**

**Re: Concerns Regarding Balance Billing & Ground Ambulance Transport**

To the Office of the Insurance Commissioner Policy Group:

The Washington Fire Chiefs (WFC) have concerns regarding the impacts of Balance Billing on Ground Ambulance Transport provided by the Washington Fire Service. As public servants, our fire agencies try to be good stewards of the tax and service revenue provided by our community, and to that end we have some comments and suggestions regarding the legislative changes to balance billing for ground ambulance services.

We understand it is the intent of the legislature to include ground ambulance in the Balance Billing Prohibition Act (BBPA), and as such, please consider the following points:

- We request a qualifying payment amount be set at least equal to 350% of Medicare, including the rural and super-rural bonus payments. This is consistent with what has been proposed and adopted in other states.
- We request agencies be allowed to bill patients for non-covered services, e.g. non-medically necessary transports.
- Fire agencies need a mechanism to work through resolving issues regarding improper payments by insurance plans/commercial carriers, as in the recent Regence matter that only gained traction through consumer complaints. The current independent dispute resolution (IDR) process is not working to resolve these issues, and our fire agencies need a course of action to mitigate improper payment amounts. Resolutions of improper payments by commercial insurance below the qualifying payment amount should involve patient's awareness and assistance.
- In addition, if the provider operates in such a way that their charges are sanctioned by local, state, or federal government, the qualifying payment amount (QPA) will be set at least equal to the government-approved rate.

We appreciate your consideration and ask that we can find a way to make these new rules work best for everyone involved.

If you have questions or concerns, please contact me.

Regards,

A handwritten signature in black ink that reads "Steve Wright". The signature is fluid and cursive.

Steve Wright, Executive Director  
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