

Finding: Network adequacy refers to federal or state standards established for health plans to guarantee the insurer can provide adequate access to covered benefits within a reasonable distance or time frame. Defining network adequacy for ground ambulance services is challenging, given the nature of emergency response. In an emergency situation, care will be provided by the first responding ground ambulance provider and the insured person does not have an option to request another service provider in an emergency, nor would there likely be an “in-network” ground ambulance provider available. Many ground ambulance providers do not contract directly with insurers due to the high administrative burden of contract negotiation, rates paid by insurer are too low and do not cover the cost to provide service, and individual ground ambulance providers provide too low of a volume to be attractive for an insurer to contract with. This contributes to the insured person receiving a surprise bill for ground ambulance transport.

An additional concern related to network adequacy is the concept of ambulance deserts, where an ambulance is not available within a 25 minute response time. Of the 41 states that participated in an analysis by the Maine Rural Health Research Center and the Rural Health Research Centers in 2021-2022, four out of five counties have at least one ambulance desert which impacts 4.5 million US citizens, more than half of those are residing in rural areas, and do not have adequate resources available to respond in an emergency. Many areas of Washington State are in an ambulance desert and residents of those counties do not have adequate access to emergency, life-saving care.

Recommendation #1: All ground ambulance providers should be considered “in-network” to reduce surprise billing. This should include inter-facility transfers when a patient needs ground ambulance transport to receive a higher level of care or the services needed are not provided in the current facility.

Recommendation #2: Emergency Medical Services should be an essential health service provided by states and rural ambulance services should be federally supported. Washing State should conduct a survey and collect data to determine the location of ambulance deserts and take action to ensure ground ambulance services are available to all residents within a 25 minute time frame or less. Ensuring adequate ground ambulance services are available to all communities will reduce the likelihood of a consumer receiving a surprise bill, as a neighboring out of network provider may be the one to respond to the emergency.