

# Medicare Ground Ambulance Data Collection Instrument: Labor and Staffing

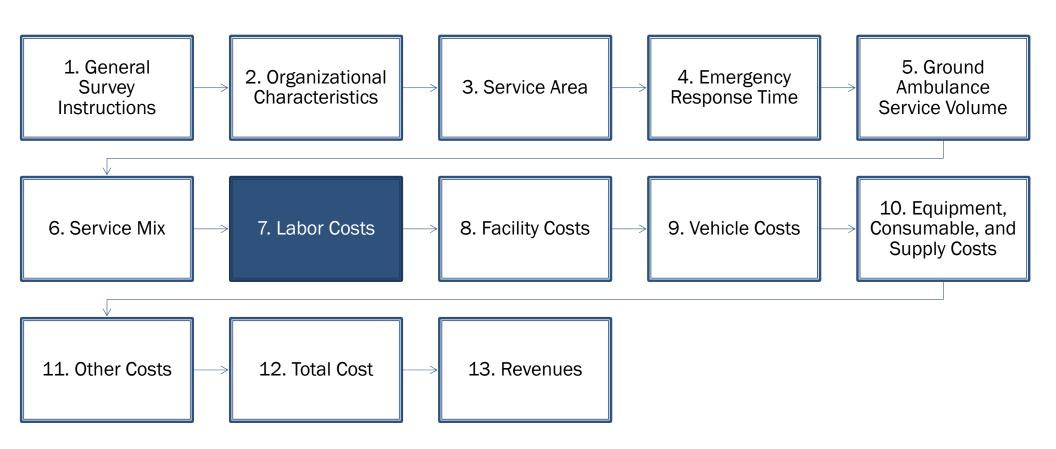
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#### Overview

- Today's session is an overview of the staffing and labor costs section of the Medicare Ground Ambulance Data Collection System (GADCS) Instrument (Section 7)
- More information is available from the Ambulances Services Center website (<a href="https://www.cms.gov/Center/Provider-Type/Ambulances-Services-Center">https://www.cms.gov/Center/Provider-Type/Ambulances-Services-Center</a>), including:
  - A printable version of the instrument
  - A frequently asked questions (FAQ) document
  - Slides from prior webinars
  - A Quick Reference Guide

## **GADCS** Reporting Sections



## CY 2022 Physician Fee Schedule Rulemaking

- The information in this webinar for Section 7 reflects changes proposed by CMS as part of the CY 2022 Physician Fee Schedule Proposed Rule
- These changes have not been finalized, and the final version of the questions and instructions may differ from what we present today
- Please check the Medicare Ambulances Services Center website and future webinars for updates (<a href="https://www.cms.gov/Center/Provider-Type/Ambulances-Services-Center">https://www.cms.gov/Center/Provider-Type/Ambulances-Services-Center</a>)

#### **Section 7 Summary**

Question 1: Which staff categories are relevant to your ground ambulance organization?

To respond to Question 1, you must assign staff members to categories following the instructions in the instrument.

Sections 7.1 and 7.2: If you have any *paid* staff, report the following by staff category:

- Total annual compensation
- Total hours worked annually
- Total hours worked separately by activity (adds up to total):

1. Ground ambulance-related activities 2. Fire/safety (i

2. Fire/police/public safety (if applicable)

3. All other activities

Section 7.3: If you have any *volunteer* staff, report the following by staff category:

- Total number of volunteers and hours worked annually
- Total hours worked annually related to police/fire/public safety duties
- Total hours worked annually related to all other responsibilities
- Total costs associated with volunteers

#### Section 7, Question 1

**Section 7, Question 1:** Please indicate if your organization had paid staff (full and/or part time) and/or used volunteer staff in each of the following categories during the data collection period (check all that apply).

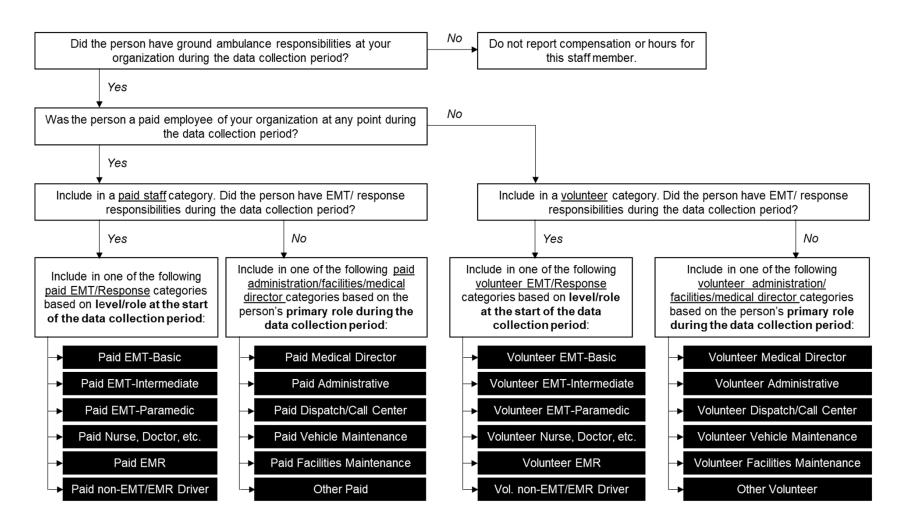
Staff Category	Paid Staff	Volunteer Staff
EMT/Response Staff		
EMT - Basic		
EMT – Intermediate		
EMT – Paramedic		
Nurse, doctor, respiratory therapist, or other medical staff		
Emergency Medical Responder (EMR)		
Ambulance Driver (non-EMT/EMR)		
Medical Director		
Administration/Facilities Staff		
Administrative (clerical, human resources [HR], billing, IT		
support, etc.)		
Management (executive, public information officer, etc.)		
Dispatch / Call Center		
Vehicle Maintenance		
Facilities Maintenance (janitorial staff, laundry, repairs, etc.)		
Other not reported above (please specify)		

Programming Note: If your organization includes fire, police or other public safety responsibilities, your presentation of this table will also break down categories by "with fire/police/public safety roles" vs. not.

#### **Section 7: Contracted Services**

- Many ground ambulance organizations contract with other companies for services like:
  - Billing
  - Accounting
  - Maintenance
  - Dispatch
  - Information technology
- If staff are not directly employed by your organization, you can report expenses related to these contracted services in Section 11 (Other Costs)

### Section 7, Question 1: How to Assign Staff to Categories



## Section 7, Question 1: How to Assign Staff Categories

 Each staff member should contribute to only one labor category for the purposes of Section 7, even if they perform multiple roles in your organization

Staff Member	Category for Reporting
A paid EMT-Basic who also performs administrative duties	Paid EMT-Basic
A paid EMT-Paramedic who volunteers additional unpaid hours	Paid EMT-Paramedic
A paid administrator handling billing and clerical duties and occasional vehicle maintenance	Paid administration/facilities category based on the primary responsibility
A volunteer EMT-Intermediate who became a volunteer EMT-Paramedic during the data collection period	Volunteer EMT-Intermediate
A volunteer EMT-Basic who became a paid EMT-Basic during the data collection period	Paid EMT-Basic
A paid EMT-Paramedic with only air ambulance responsibilities	Not reported in Section 7

#### Section 7, Question 2

- If you did not select any of the categories in Section 7, Question 1, you will be asked to report reasons why:
  - This labor category is part of our ground ambulance operation but is paid for or provided at no cost by another entity.
  - One or more staff do perform these functions, but we assigned these staff to another category per the instructions.
  - We do not have staff in this labor category related to our ground ambulance operation and/or we contract with another organization for this role.
  - Other (please specify:)

### Section 7.1, Question 1

• Section 7.1, Question 1: This question asks about paid EMT/Response staff (both full and/or part time) in your organization during the data collection period.

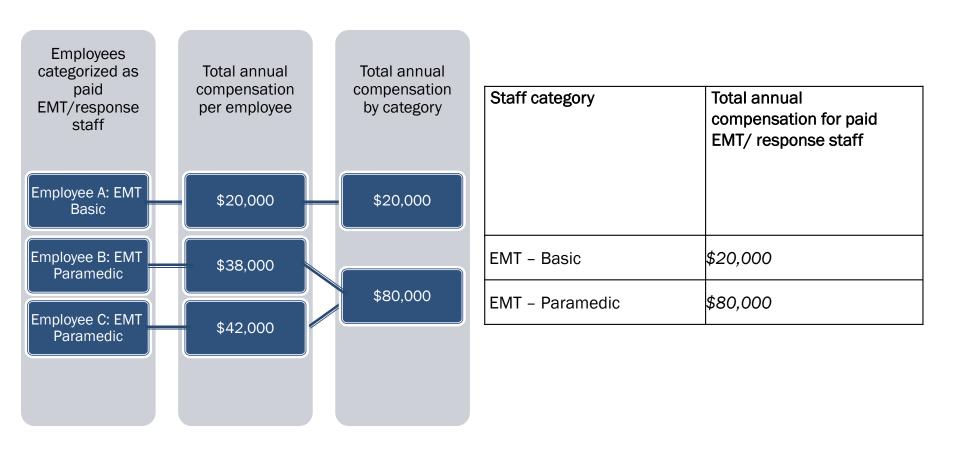
Staff Category	Total annual compensation	Total hours worked annually	Total hours worked annually: Ground ambulance activities	Total hours worked annually: Fire/police/public safety activities	Total hours worked annually: All other activities
EMT - Basic	Dollars	Hours	Hours	Hours	Hours
EMT - Intermediate	Dollars	Hours	Hours	Hours	Hours
EMT - Paramedic	Dollars	Hours	Hours	Hours	Hours
Nurse, doctor, or other medical staff	Dollars	Hours	Hours	Hours	Hours
Emergency Medical Responder (EMR)	Dollars	Hours	Hours	Hours	Hours
Ambulance Driver (non- EMT/EMR)	Dollars	Hours	Hours	Hours	Hours

Programming Note: Rows will appear only for the staff categories you selected in Section 7, Question 1.

### Section 7.1: Total Annual Compensation

- Report total compensation for ALL paid staff in each of the EMT/response categories combined
  - Includes salary/wages and, when applicable, benefits (e.g., healthcare, paid time off [PTO], retirement, stipends, life insurance), overtime, training time, and callback and standby pay for paid staff
- If one or more components of compensation costs (e.g., benefits) were paid by another entity with which you had a business relationship (e.g., a municipality that you serve), please obtain and include these costs when you report total compensation
  - If only total costs in a category are available from another entity (e.g., total benefits costs across all staff), please allocate to labor categories based on salary or wages across labor categories

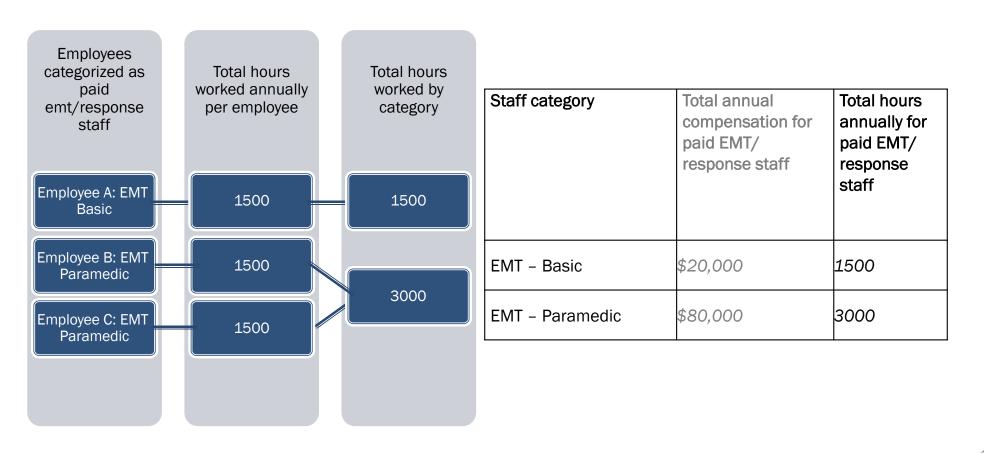
#### Section 7.1: Total Annual Compensation, Public Safety Example



#### Section 7.1: Total Hours Worked Annually for paid EMT/Response Staff

- Report total hours worked annually by paid EMT/response staff (including fulland part-time staff) in each category
- Include hours for ground ambulance AND other activities
- Other activities may include:
  - Fire/police/public safety duties
  - Air ambulance operations
  - · Healthcare delivery unrelated to ground ambulance, such as work in a clinic
  - Public health responsibilities
  - · Community education and outreach
  - Community paramedicine
  - Any other responsibility unrelated to ground ambulance activities

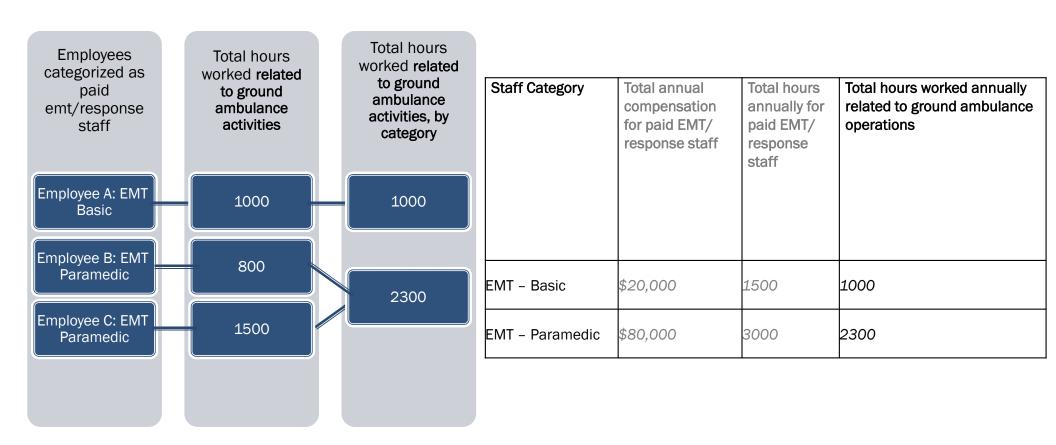
# Section 7.1: Total Hours Worked Annually for ALL paid EMT/ Response Staff, Public Safety Example



# Section 7.1: Total Hours Worked Annually Related to Ground Ambulance Activities

- For the same paid EMT/response staff who contributed to total worked hours reported in the prior question, report hours worked annually in each staff category that were related to ground ambulance activities
- This includes:
  - Responses to calls
  - Administrative, facilities, and management activities
- "On call" time is not included

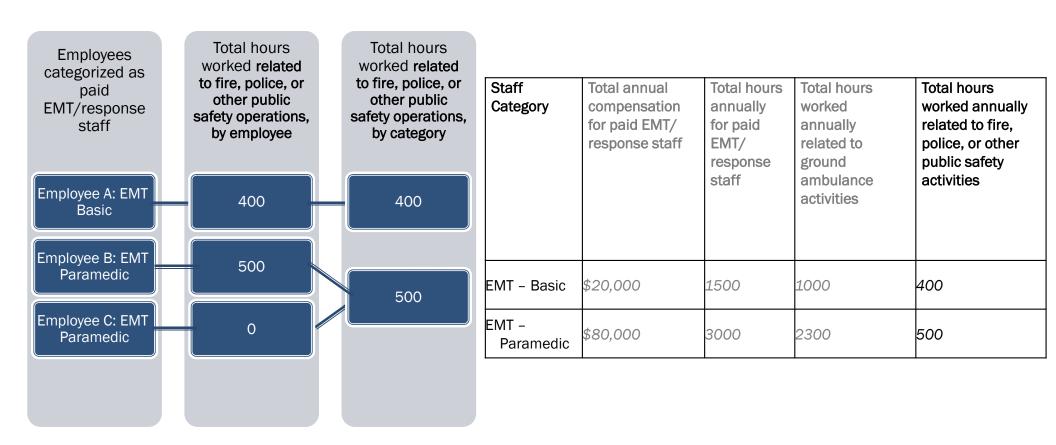
# Section 7.1: Hours Worked Annually Related to Ground Ambulance, Non-Public Safety Example



# Section 7.1: Total Hours Worked Annually Related to Fire, Police, or Other Public Safety Operations

- For the same paid EMT/response staff that contributed to total worked hours reported in the prior question, report hours worked annually in each staff category that were related to fire, police or other public safety operations
- This question will only appear for organizations indicating they share services with one of these agencies and have staff with both ground ambulance and fire, policy or other public safety duties

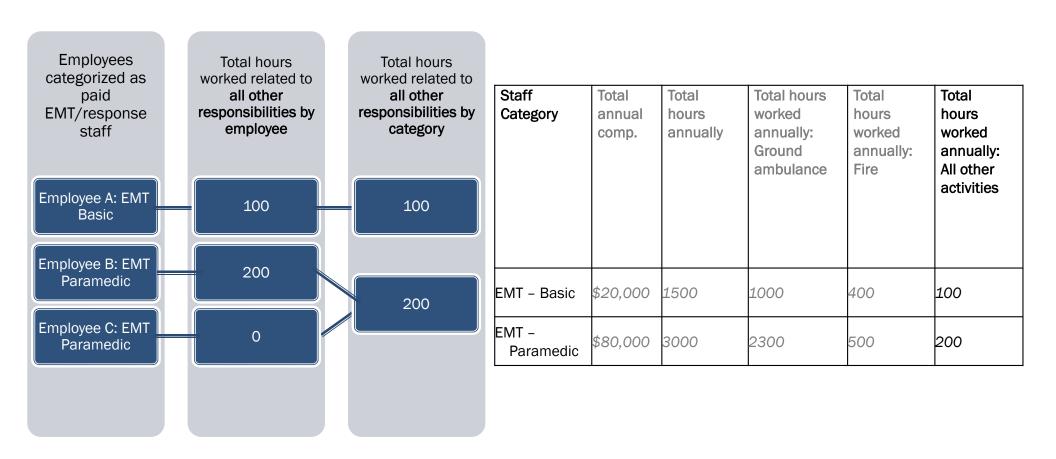
# Section 7.1: Hours Worked Annually Related to Ground Ambulance, Public Safety Example



#### Section 7.1: Total Hours Worked Annually Related to all Other Responsibilities

- For the same paid EMT/response staff that contributed to total worked hours, report hours worked annually in each staff category that were related to all other responsibilities
- Other responsibilities could include:
  - Air ambulance operations
  - Healthcare delivery unrelated to ground ambulance, such as work in a clinic
  - Public health responsibilities
  - Community education and outreach
  - · Community paramedicine
  - Any other responsibility unrelated to ground ambulance activities
- Do not report fire, police or public safety hours in this question if you share services with one of these agencies

# Section 7.1: Total Hours Worked Annually Related to all Other Responsibilities Example



#### Section 7.1: Total Hours Worked Annually: Checks for Accuracy

Total hours in the "Total hours annually" column should equal the sum of the next three columns

Staff Category	Total annual comp.	Total hours annually	Total hours worked annually: Ground ambulance	Total hours worked annually: Fire	Total hours worked annually: All other activities
EMT - Basic	\$20,000	1500	1000	400	100
EMT – Paramedic	\$80,000	3000	2300	500	200

#### **Examples:**

EMT – Basics: 1,500 = 1,000 + 400 + 100

EMT - Paramedics: 3,000 = 2,300 + 500 + 200

### Section 7.2, Question 1

 Section 7.2, Question 1: This question asks about paid medical director and administration/facilities staff (both full and/or part time) in your organization during the data collection period.

Staff Category	Total annual compensation	Total hours annually	Total hours worked annually: Ground ambulance operations	Total hours worked annually: Fire, police, and other public safety	Total hours worked annually: All other activities
Medical Director	Dollars	Hours	Hours	Hours	Hours
Administration/ Facilities Staff	Dollars	Hours	Hours	Hours	Hours

**Programming Note:** Rows will appear for staff categories you use.

## Section 7.2: Hospital-based Provider Example

Staff #1: Clerical	Staff #2: Manager	Staff #3: Manager	Staff #4: Maintenance	Staff #5: Medical Director
<ul> <li>Clerical staff working</li></ul>	<ul> <li>Manager working entirely on ground ambulance services</li> <li>Includes human resource, training, and compliance responsibilities.</li> </ul>	Manager working	<ul> <li>Maintenance staff member</li></ul>	Medical director at
entirely on ground		only half-time on	working one-quarter time on	one-quarter time at
ambulance services <li>Includes duties such</li>		ground ambulance	ground ambulance services. <li>Performs maintenance on</li>	the ambulance
as payroll and		services and half-	equipment throughout the	organization, no other
coordinating		time on hospital	hospital and on-board	responsibilities at the
contracted services.		responsibilities.	ambulances.	hospital.

## Section 7.2: Hospital-based Provider Example (continued)

Staff #1: Clerical	Staff #2: Manager	Staff #3: Manager	Staff #4: Maint.	Staff #5: Med. Director
<ul><li>2,000 hours/year</li><li>Total compensation: \$40,000/year</li></ul>	<ul><li>2,000 hours/year</li><li>Total compensation: \$60,000/year</li></ul>	<ul> <li>2,000 hours/year (1,000 hours unrelated to ground ambulance)</li> <li>Total compensation: \$65,000/year</li> </ul>	<ul> <li>2,000 hours/year (1,500 hours unrelated to ground ambulance)</li> <li>Total compensation: \$45,000/year</li> </ul>	<ul> <li>520 hours/year (part-time)</li> <li>Total compensation: \$50,000/year</li> </ul>

Staff Category	Total annual compensation	Total hours worked annually	Total hours worked annually: Ground ambulance operations	Total hours worked: All other activities
Administrative/ Facilities Staff	\$210,000	8,000	5,500	2,500
Medical Director	\$50,000	520	520	0

#### Calculations

40,000 + 60,000 + 65,000 + 45,000 = 210,000 Total annual compensation for admin/facilities staff

2,000 hours + 2,000 hours + 2,000 hours + 2,000 hours = 8,000 Total hours for admin/facilities staff

2,000 hours + 2,000 hours + 1,000 hours + 500 hours = 5,500 Total hours, ground ambulance activities

1,000 hours + 1,500 hours = 2,500 Total hours related to all other activities

#### Section 7.3: Volunteer Labor

- In this section you will report on volunteers:
  - Number of individuals who were volunteers during the data collection period, by labor category
  - Hours worked for volunteer EMT/response staff, by category, following the same format as for paid staff
    - Hours worked includes the time from which the volunteer receives a call or a page to the time they are finished with their call, as well as time spent in the station house performing duties as if they were being paid. Do not include hours spent 'on call' in this section
  - Total costs related to volunteers, e.g., stipends, allowances, honoraria, etc.

**Programming Note:** This section will only appear if you check "volunteer" for one of the labor categories in Section 7, Question 1

### Summary of Considerations for Volunteer Labor

- Do not count any employee twice for the purposes of collecting and reporting information in Section 7:
  - An employee should not be counted as both paid and volunteer
  - If an employee transitioned from volunteer to paid, count them as paid and only count the hours worked and compensation for when they were paid
  - If a volunteer receives benefits or a nominal stipend (e.g. \$500/year), they may still be considered a volunteer and associated hours worked and costs are reported in the volunteer section
  - Report all costs associated with volunteers in Section 7.3 (e.g. stipends, health insurance, training) that are NOT reported elsewhere in the instrument. Do not double count costs (e.g., uniforms for volunteers) in multiple sections of the instrument

- Each staff member should contribute to only one labor category for the purposes of Section 7, even if they perform multiple roles in your organization
- Include only individuals who had responsibilities that were either partly or entirely related to your ground ambulance operation
- Do not include individuals who had only non-ground ambulance responsibilities
- Include EMT/response staff, even if they have admin/facilities or fire/police/public safety responsibilities, in the EMT/response category that matched their level at the start of the data collection period

- For administration/facilities staff with multiple roles, assign each individual to a category indicating the individual's primary activity
- Include staff who were both paid and volunteer during data collection period in the appropriate paid staff category
- Do not report on outside contracted services in Section 7.
   You will have the opportunity to report costs for these services in another section

#### For reporting total compensation:

- Includes salary/wages and, when applicable, benefits (e.g., healthcare, paid time off [PTO], retirement, stipends, life insurance), overtime, training time, and callback and standby pay for paid staff
- If one or more components of compensation costs (e.g., benefits) were paid by another entity with which you had a business relationship (e.g., a municipality that you serve), please obtain and include these costs when you report total compensation.
- If only total costs in a category are available from another entity (e.g., total benefits costs across all staff), please allocate to labor categories based on salary or wages across labor categories

- For reporting total hours worked annually:
  - Report the sum of hours worked at your organization across all staff assigned to the category
  - Include all hours, including hours unrelated to your ground ambulance operation
- If applicable to your organization, report hours related to ground ambulance operations versus fire, police, and other public safety operations using your best judgement
- For reporting hours related to all other responsibilities:
  - Report hours worked by staff assigned to the category on activities other than ground ambulance or public safety duties, including:
    - · Air ambulance operations
    - Healthcare delivery unrelated to ground ambulance operations, such as work in a clinic
    - Public health responsibilities
    - Community education and outreach
    - Community paramedicine
    - Any other responsibility unrelated to ground ambulance and fire/police/public safety activities

# Section 7: Full Illustrative Example

### Introduction to Illustrative Example

- This section walks through a completed labor section for a hypothetical government ground ambulance organization
- All answers are hypothetical and are not intended to provide benchmarks for typical costs or other volumes
- Certain items will be marked [Not shown] if not applicable to the organization based on previous responses

**Note:** This example illustrates scenarios that may be less complex than those faced by your organization. We will address issues that may be more relevant to your organization in separate webinars on volunteer, public safety (e.g., fire-based, police-based), and provider organizations.

## Hypothetical organization background

- The organization serves a small city and performs around 2,000 transports each year
  - The organization's primary revenue stream is paid emergency transports from a variety of payers (Medicare, Medicaid, etc.), but occasionally performs scheduled transports and receives some funding and resources from the city they serve
  - The organization has a mix of paid and volunteer staff
  - The organization's 12-month data collection period began January 1, 2022

### Organization's labor structure and contracted services

#### **Response Staff**

#### **EMT-Basic**

- 8 volunteers that work part-time, usually 15-20 hrs/week
- Each receives small stipend (\$500/year) plus limited benefits
- Primary duties are responses and transports, but occasionally assist with community outreach and standby events

#### **EMT-Paramedic**

- 5 full-time paid employees
- Each receives annual salary of \$35,000-\$40,000/year plus benefits
- Primary duties are BLS/ALS responses and transports, and occasional community outreach and standby events
- One EMT occasionally performs basic vehicle maintenance
- One EMT joined March 1 at \$35,000/year salary

#### Other Staff

#### **Administrative Staff**

- Two full-time paid administrative staff members responsible for accounting, office management, licensing, compliance, etc.
- Each receives an annual salary of \$40,000 plus benefits

#### **Medical Director**

- One part-time medical director who works approximately 9 hours per week
- Receives \$75,000 in annual salary and no benefits

#### **Contracted Services**

#### Contracted Services NOT included in labor section

 Facilities maintenance, janitorial services, advanced vehicle maintenance, call center/dispatch services

## Section 7, Question 1 - Example

• Please indicate if your organization had paid staff (full and/or part time) and/or used volunteer staff in each of the following categories during the data collection period (check all that apply).

Staff Category	Paid Staff	Volunteer Staff
EMT/Response Staff		
EMT - Basic	No	Yes
EMT – Intermediate	No	No
EMT - Paramedic	Yes	No
Nurse, doctor, respiratory therapist, or other medical staff	No	No
Emergency Medical Responder (EMR)	No	No
Ambulance Driver (non-EMT/EMR)	No	No
Medical Director	Yes	No
Administration/Facilities Staff		
Administrative (clerical, human resources [HR], billing, IT support, etc.)	Yes	No
Management (executive, public information officer, etc.)	Yes	No
Dispatch / Call Center	No	No
Vehicle Maintenance	No	No
Facilities Maintenance (janitorial staff, laundry, repairs, etc.)	No	No
Other not reported above (please specify)	No	No

**Programming Note:** This organization will not see the second two columns about staff with fire/police/public safety roles based on earlier answers indicating that they did not have these services.

## Section 7, Question 2 - Example

• In the previous question, you reported that you did **not** use any of the categories below in your ground ambulance operation in calendar year 2022. Please select one or more reasons why [select all that apply]:

Staff Category	This labor category is part of our ground ambulance operation but is paid for or provided at no cost by another entity (1).	One or more staff do perform these functions, but we assigned these staff to another category per the instructions (2)	We do not have staff in this labor category related to our ground ambulance operation and/or we contract with another organization for this role (3)	Other (please specify) (4)
EMT/Response Staff				
EMT - Intermediate			Yes	
Nurse, doctor, respiratory therapist, or other medical staff			Yes	
Emergency Medical Responder (EMR)			Yes	
Ambulance Driver (non-EMT/EMR)			Yes	
Administration/Facilities Staff				
Dispatch / Call Center			Yes	
Vehicle Maintenance		Yes	Yes	
Facilities Maintenance (janitorial staff, laundry, repairs, etc.)			Yes	

**Note:** This organization only sees staff categories that they indicated that they didn't have in the prior question. They also have the option to select multiple categories.

## Section 7.1, Question 1 - Example

 This question asks about paid EMT/Response staff (both full and/or part time) in your organization during the data collection period

Staff Category	Total annual compensation for paid EMT/ response staff	Total hours annually for paid EMT/ response staff	Total hours annually for paid EMT/response staff: Ground ambulance operations	Hours worked annually: All other activities
EMT –	Response: \$193,100	Response: 9,667	Response: 9,627	Response: 40
Paramedic				

#### Calculations:

- 2 full-year EMTs x (35,000 \$/year/EMT salary + 2,800 \$/year/EMT benefits) + 2 full-year EMTs x (40,000 \$/year/EMT salary + \$3,000 \$/year/EMT benefits) + 1 part-year EMT x (\$35,000 \$/year salary + \$2,800 benefits) x (10/12 months worked of year) = \$193,100
- 4 full-year, full-time EMTs x (2,000 hours/year/EMT) + 1 part-year, full-time EMT x (2,000 hours/year) x (10/12 months worked of year) = 9,667 hours
- Two community outreach events during the year staffed by EMT accounted for **40 hours** worked across all EMTs. Total hours worked for ground ambulance operations are 9,667 40 = **9,627 hours**

**Note:** This organization only sees response staff categories for which they previously indicated that they employed paid staff. They do not see the option to report hours worked for fire/police/public safety duties because this organization does not have those services.

### Section 7.2, Question 1 - Example

 This question is about staff without EMT/response responsibilities, including administrative/facilities staff and medical director(s), in your organization annually in calendar year 2022

Staff Category	Total annual compensation	Total hours worked annually	Total hours worked annually: Ground ambulance operations	Total hours worked annually: All other activities
Administrative/	Response: 85,600	Response: 4,000	Response: 4,000	Response: 0
Facilities Staff				
Medical	Response: 75,000	Response: 475	Response: 475	Response: 0
Director				

#### Calculations:

2 Administrative Staff x (40,000 \$/year/staff salary + 2,800 \$/year/EMT benefits) = \$85,600

2 Administrative Staff x (2,000 hours/year/staff) = 4,000

Medical Director: Salary is \$75,000/year with no benefits, works 475 hours/year

**Note:** This organization only sees staff categories without EMT/response responsibilities for which they previously indicated that they employed paid staff.

### Section 7.2, Question 2 - Example

Among staff who were partly or entirely related to your ground ambulance operation, did you have
one or more individual staff members devoting a total of at least half time (i.e., 1,000 hours
annually or approximately 20 hours a week) to each of the following activities? Do not include
individuals whose services were part of an outside contracted service(s).

```
a) Billing (Yes (1), No (0))
Response: Yes (1)
b) Data analysis (Yes (1), No (0))
Response: No (0)
c) Training (Yes (1), No (0))
Response: No (0)
d) Medical quality assurance (Yes (1), No (0))
Response: No (0)
```

## Section 7.2, Questions 3-4 - Example

Note: This organization will NOT see Question 3, which relates to organizations with multiple NPIs.

4. Does your organization contract with a medical director, rather than employing them directly? Yes (1), No (0).

Response: No (0)

**Note:** Question 4 is displayed for all organizations as a check on answers. If your answer conflicts with that given in Section 7, Questions 1-2, you will see a warning directing you to clarify your response.

**Note:** This organization will *NOT* see Part 2 of Question 4 which asks for total compensation of the medical director and will only be shown for organizations that answer *Yes* (1) to Part 1.

## Section 7.3, Questions 1-5 - Example

**Note:** This organization is seeing Question 1 based on their previous response that they had volunteer EMTs and the table in Question 2 has been auto-populated with the EMT/response roles for which the organization previously indicated that they used volunteers

- 1. How many **individuals** were EMT/response volunteers in calendar year 2022? (Enter number). *Response:* 8
- 2. This question is about the hours of EMT/response volunteers annually during calendar year 2022.

EMT/Response Staff Category	Total hours for all volunteer EMT/response staff	Total hours for all volunteer EMT/response staff: Ground	Hours worked annually: All other activities
		ambulance operations	
EMT - Basic	Response: 6,750	Response: 6,700	Response: 50

**Calculations:** 2 volunteers worked 750 hours total in 2022 (average of  $\sim$ 15 hrs/wk), 5 volunteers worked 850 hours in total in 2022 (average of  $\sim$ 17 hrs/wk), 1 volunteer worked 1000 hours total in 2022 (average of  $\sim$ 20 hrs/wk). (750 x 2) + (850 x 5) + 1000 = 6,750 total volunteer hours. Of these, 6,750 – 50 = 6,700 were ground ambulance hours.

**Note:** This organization will not see Questions 3-5 in this section because they relate to volunteer administrative and medical director roles, which the organization previously indicated that they didn't have.

### Section 7.3, Question 6 - Example

6. Did your organization provide stipends, honoraria, benefits, and/or other compensation for ground ambulance volunteer labor? Yes (1), No (0)

Response: Yes (1)

6.i. What was the total cost for all volunteer compensation (e.g. stipends and/or benefits) in calendar year 2022? (Enter dollar amount)

Response: \$10,000

## Frequently Asked Questions (FAQ)

- An FAQ and other resources are available from the Ambulances Services Center website (<a href="https://www.cms.gov/Center/Provider-Type/Ambulances-Services-Center.html">https://www.cms.gov/Center/Provider-Type/Ambulances-Services-Center.html</a>)
- Labor-related questions in the FAQ include:
  - How should staffing and labor costs be reported if some staff have both administrative/facilities and emergency medical technical (EMT)/response responsibilities?
  - What if some of my organization's staff have non-ground ambulance responsibilities (e.g., air ambulance operations, public health responsibilities, or fire/police activities)?
  - How should staffing and labor costs be reported if some staff changed roles during the data collection period?

#### **Closing Comments**

- Examples provided are for illustrative purposes only. Responses will vary based on organization type, staffing structure, and other factors
- The specific information that you will have to report will vary depending on how you answer questions about your organization in earlier sections and within Section 7
- CMS is hosting additional webinars focusing on data collection and reporting for certain types of organization (e.g., volunteer, public safetybased, and provider organizations)
  - You can sign up on the Ambulances Services Center website:
     <a href="https://www.cms.gov/Center/Provider-Type/Ambulances-Services-Center">https://www.cms.gov/Center/Provider-Type/Ambulances-Services-Center</a>