



Association of Air Medical Services, Arizona Chapter

September 28, 2018

Mary E. Kosinski
Arizona Department of Insurance
100 N. 15th Ave., Suite 102
Phoenix, Arizona 85007-2624

To Whom It May Concern:

On behalf of the Arizona Association of Air Medical Services (AZ AAMS), which represents four of the largest air ambulance companies that operate in the State of Arizona, we would like to offer a comment in the Department of Insurance (DOI) "Out of Network Claim Dispute Resolution" rulemaking process.

The members of AZ AAMS include Air Methods, PHI Air Medical, Guardian Air and Med-Trans Corporation, and represent over 600 employees serving statewide. We operate over 50 bases 24 hours a day, seven days a week in every county in Arizona. In 2017, the members of our Association provided over 10,000 critical care transports.

In rural Arizona, air medical transport is the key link to ensuring timely access to essential health treatments and diagnosis for 346,000 rural citizens. Rapid access to the appropriate level of medical care is the difference between a return to a relatively normal life or a life of disability, dependence, or premature death, as well as the financial impact of each outcome.

Nationwide, air medical providers are familiar with the issue being addressed in this DOI rulemaking process. As the healthcare landscape continues to evolve, we have had an ongoing dialogue with insurance providers and each of our companies have patient-centered programs that attempt to resolve billing issues in a compassionate way.

As you may know, the air medical industry is regulated by the federal Airline Deregulation Act and is not included in the industries specified in ARS 20-3111 through 20-3119, specifically referenced in 20-3113: "The bill was for emergency services, including under circumstances described by section 20-2803, subsection A and health care services directly related to the emergency services that are provided during an inpatient admission to any network facility."

While the air medical industry is not regulated by the law referenced in DOI's current rulemaking process, we want to be clear that we are committed to ensuring patients receive fair billing. Our companies are engaged with federal lawmakers and other important stakeholders to continue to deliver top-notch service to patients at a fair cost.

Please do not hesitate to reach out if you have any questions.

Sincerely,

Ed Brouse
President
AZ AAMS

Air Methods



PHI Air Medical,
L.L.C.



Guardian Air



Med-Trans
Corporation

