



Testimony in Opposition to

LD 1192, An Act to Increase the Commercial Insurance
Reimbursement Rate for Ambulance Services

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Senator Bailey and Representative Mathieson and distinguished members of the Health Coverage, Insurance and Financial Services Committee, my name is Kim Cook and I am an attorney with Government Strategies, testifying in opposition to LD 1192 on behalf of Community Health Options. Community Health Options is Maine's nonprofit CO-OP health insurance company and exists for the benefit of its Members and its mission which is to provide affordable, high-quality benefits that promote health and wellbeing.

For the last five years, Community Health Options has participated in the stakeholder groups regarding reimbursement rates for ambulance services which were first established by PL 2019 c. 668¹. We have appreciated the collaborative process and supported the recommendation that the Legislature set the reimbursement rate contained in Section 4303-F of the Health Plan Improvement Act. To our knowledge, this is the first, and only, instance of the Legislature setting rates for health care services that state-regulated health plans must pay to a provider.

As the Committee is aware, state-regulated commercial health plans provide coverage to approximately 25% of Maine people and this bill would apply only to this segment of health coverage. That leaves 75% of Maine people who are covered through (1) self-funded employer-sponsored ERISA plans which the state is preempted from regulating (~25%), (2) Mainecare, the state's Medicaid plan (~29%), and (3) the remainder have coverage through Medicare or the Veterans Administration.²

¹ LD 2105, An Act to Protect Consumers from Surprise Emergency Medical Bills

² Health Insurance Overview and the Role of the Maine Bureau of Insurance, January 2025 *available at* <https://www.maine.gov/pfr/insurance/sites/maine.gov/pfr/insurance/files/inline-files/CHCD%20Slides%20for%20HCIES%202025.pdf> and Department of Health and Human Services Orientation Presentation, January 2025 *available at* <https://legislature.maine.gov/doc/11376>

In addition, only 9% of ambulance claims were for people with commercial insurance and 1/3 of those claims were covered by self-funded plans not subject to state regulation.³ It is simply untenable to try to solve the financial strain of EMS providers by requiring state regulated commercial health plans to pay 400% of what Medicare and our own state's Medicaid plan pays for these services. This bill would result in increasing premiums for those with state-regulated commercial health coverage.

MaineCare currently reimburses ambulance providers at 100% of Medicare. The Office of MaineCare Services recently opposed a bill⁴ before the Health and Human Services Committee that proposed to require MaineCare to provide higher reimbursement rates for ambulance services stating: "the Department feels its current reimbursement targeting 100% of Medicare is a reasonable and adequate amount."⁵

We urge the Committee to vote Ought Not to Pass on LD 1192. Thank you for your consideration of our testimony.

³ Final Report of the Maine EMS LD2105 Subcommittee, February 1, 2021 *available at* <https://legislature.maine.gov/doc/6562>

⁴ LD 1429, An Act to Provide Full Reimbursement for Emergency Ambulance Services Provided to MaineCare Members.

⁵ Testimony of the Department of Health and Human Services *available at* <https://legislature.maine.gov/bills/getTestimonyDoc.asp?id=10044927>