Wisconsin Office of the COMMISSIONER OF INSURANCE

Tony Evers, Governor of Wisconsin
Nathan Houdek, Commissioner of Insurance

December 15, 2025

Mr. Cyrus Anderson
Senate Chief Clerk
State Capitol
P.O. Box 7882
Madison, WI 53707

Mr. Ted Blazel
Assembly Chief Clerk
17 West Main Street
Room 401
Madison, WI 53703

Re: Social and Financial Impact Report—2025 Senate Bill 711 & Assembly Bill 720—relating to coverage and reimbursement of emergency ambulance services under health insurance policies and plans.

Dear Chief Clerks Anderson and Blazel:

Pursuant to Wis. Stat. § 601.423, the Office of the Commissioner of Insurance (OCI) is submitting a social and financial impact report on 2025 Senate Bill 711 and Assembly Bill 720 relating to coverage and reimbursement of emergency ambulance services under health insurance policies and plans.

Coverage Mandates

OCI has determined that 2025 Senate Bill 711 and Assembly Bill 720 relating to coverage and reimbursement of emergency ambulance services under health insurance policies and plans require a social and financial impact report for the following reasons:

1. Requires a particular benefit design or imposes conditions on cost sharing under an insurance policy, plan, or contract for the treatment of a particular disease, condition, or other health care need, for a particular type of health care treatment or service, or for the provision of equipment, supplies, or drugs used in connection with a health care treatment or service.
2. Imposes limits or conditions on a contract between an insurer and a health care provider, as defined in s. 146.81 (1).

Social Impact

Under the bills, defined network plans, preferred provider plans, and self-insured governmental plans that provide coverage of emergency medical services are required to cover emergency ambulance services provided by an ambulance service provider that is not a participating provider at one of the following rates, according to this order of priority:

1. A rate that is mutually agreed upon by the plan and the ambulance service provider.
2. A rate that is set or approved by a local governmental entity in the jurisdiction in which the emergency ambulance services originated.
3. A rate that is 350 percent of the Medicare program's published rate for the services in the same geographic area or a rate that is equivalent to the rate billed by the ambulance service provider for the services, whichever is less.

The bills provide that an ambulance service provider that is reimbursed at the applicable rate may not charge an enrollee an additional amount for the emergency ambulance services except for any cost-sharing responsibility, such as a copayment, coinsurance, or deductible. The bills also prohibit the plan from imposing a cost-sharing amount on an enrollee that is greater than the amount that would have applied had the ambulance service provider been a participating provider.

The bills further require that a health insurance policy or self-insured governmental health plan respond to claims for covered emergency ambulance services within 30 days by remitting payment directly to the ambulance service provider or by notifying the provider of any defect with the claim. The bills also provide that the policy or plan must remit payment for the transportation of a patient by ambulance (including transport from one facility to another to receive services not available at the first) as a medically necessary emergency ambulance service at a rate as described above if the ambulance service provider includes with its claim for payment a medical necessity certification statement signed by an individual who meets criteria established by federal regulations.

Financial Impact

OCI is unable to determine the extent to which the bills will impact the administrative and claims costs of insurers, as well as the premium costs of consumers and employers.

Please contact Sarah Smith at (608) 267-9460 or Sarah.Smith2@wisconsin.gov if you have any questions.

Respectfully submitted,

Nathan Houdek
Commissioner

Cc: The Honorable Tony Evers, Governor of Wisconsin