

OCEMS POLICIES- PUBLIC COMMENT RESPONSES

OCTOBER 29, 2013 TO DECEMBER 17, 2013

OCEMS Policy #330.60- Transfer of Patient Care: EMT-P to Air Ambulance Flight Nurse

Date	Contact	Organization	Comment	OCEMS Response
12-10-13	Bill Weston	AAOC	No Comments	Acknowledged.
12-17-13		Lynch EMS	No Comment	Acknowledged.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 1, III.B.1. Shall provide verbal report of the patient's condition to the flight nurse....</u> What about the flight medic?	Acknowledged. Policy revised to: <i>"Shall provide verbal report of the patient's condition to the air ambulance medical flight crew".</i>
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 1, III.B.3. If using a paper PCR, shall send the PCR (white) copy and EMS (pink) copy of the PCR with the patient.</u> In the past we always faxed the PCR to the hospital upon completion because the paper PCR was rarely complete by the time the patient was loaded. This should continue to be an option for agencies who are still creating paper PCR's..	Acknowledged: Policy revised to: <i>"Documentation shall be completed per policy 300.10 - OC-MEDS Documentation Standards".</i>

OCEMS Policy #330.75- Tactical EMS

Date	Contact	Organization	Comment	OCEMS Response
12-10-13	Bill Weston	AAOC	No Comments	Acknowledged.
12-17-13		Lynch EMS	No Comment	Acknowledged.
12-17-13	Suzanne Goodrich	Orange City Fire	No Comment	Acknowledged.

OCEMS Policy #430.10- Accreditation to Practice: EMT-P

Date	Contact	Organization	Comment	OCEMS Response
12-10-13	Bill Weston	AAOC	No Comments	Acknowledged.
12-16-13	Patrick Powers	Lynch EMS	The provision for the any Paramedic accreditation to expire, or for there to be renewal fees is contrary to EMS Guideline 130 Section 7. Specifically, the guideline states " Accreditation to practice shall be continuous as long as the EMT-P maintains a valid license, maintains the appropriate level of education and training, and adheres to local medical care standards and protocols as developed by the medical director after consultation with the EMS community. Given the recent changes in EMT-P licensure and the legislative intent to promote statewide paramedic recognition, it is recommended that no limitations or additional requirements be placed on field care audits (e.g., 50% completed at base hospitals in your jurisdiction). The LEMSA should not require reapplication or additional accreditation fees	Acknowledged- OCEMS Comment: Specialty paramedics require accreditation requirements and resources above the level of EMT-P's.

			if accreditation has not been removed."	
12-17-2013	Jimmy McNeal	Schaefer Ambulance Service, Inc.	attached is a word file with comments for 720.302, 304, 306 43.10 and xxx.xx	<i>See next line for submitted comment.</i>
	Jimmy McNeal	Schaefer Ambulance Service, Inc	<u>430.10 pg 5 Note</u> Will OCEMSA consider licensing an ALS unit that already is accredited in another county, for example the vehicle is already licensed in Los Angeles County? If OCEMS is willing to license the unit then you may want to consider adding language to this section to address units that are dual licensed.	Acknowledged- OCEMS Comment: Policy 430.10 is specific to personnel accreditation and not licensing of ambulances or ALS Units.
12-17-13		Lynch EMS	NALL Paramedic Accreditation should be treated equally and consistently with EMSA Guideline 130o Comment	See previous response provided for same/similar comment.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 2; V.1.D. 2. Only OCEMS, The OC Paramedic Training Program, an OC base hospital coordinator or an OC ALS service provider EMS coordinator may provide items a, b and c above.</u> We support this standard.	Acknowledged.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 2; old section G New graduates of an Orange County paramedic training program are exempt from items E., F., G., and H. of this section if applying for accreditation within six (6) months of graduation.</u> What is the rationale for deleting this item? This means that we have to do an ALS Airway review class, review of local optional scope of	Policy applicable sections: "Section V. F. Successfully complete a maximum 8 hour orientation program of the Orange County EMS system as prescribed by OCEMS (includes F.1-3), Section V. G. Complete training in any local optional scope of practice for which the individual has not been trained and tested (including G 1-2), and Section V. H. Successfully complete field evaluation of no more than 10 ALS responses supervised by an

			practice for which the individual has not been trained and tested, completion of 10 ALS responses, and pay a fee on all of our new grads from Saddleback.	approved field preceptor and/or an Orange County Base Hospital Coordinator.” Acknowledged- OCEMS Comment: The standards for Orange County Paramedic Accreditation establish a minimum requirement for paramedic accreditation for all paramedics applying for Orange County EMS Paramedic Accreditation. Section V. E. Pay the established fee. Acknowledged- OCEMS Comment: Paramedic accreditation fees are established based on the processing and administration of paramedic accreditations within Orange County. Paramedic Accreditation fees are applicable to all paramedics applying for Orange County EMS Paramedic Accreditation.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 3; VI. 2. C. Demonstrate sufficient patient contact experience through participation in the OC EMS system-wide continuous quality improvement plan.</u> We request further clarification of this item. 1. What constitutes “sufficient” 2. “participation in the OC EMS system-wide continuous quality improvement plan” what exactly does this mean? Does the statement apply to the provider agency or the individual paramedic? Is it based on	Acknowledged: Policy revised to: “Demonstrate sufficient patient contact experience as evidenced by PCR documentation review based on agency standards and CQI plan as submitted to OCEMS.”

			a certain number of patient contacts or a certain number of procedures entered and their success rate? Is it based on a certain number and type of QI fallout identified by the provider or base hospital? We suggest “sufficient” should not be based upon certain procedures entered that would require duplicate data entry as the Image Trend software functions today. Example: If a pulse ox result is documented, the field provider should not be required to also document pulse ox monitoring in the procedures section. The same is true for cardiac monitoring, blood glucose testing, and other procedures such as BVM ventilation that requires documentation of oxygen administration via PPV in the medication section. The software should be able to enter the procedure as being performed when the result is documented or the medication is entered.	
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 4; VII Inactive Status: A 911-ALS paramedic will be considered INACTIVE if any conditions listed in section VI. #1 are not satisfied.</u> What constitutes “sufficient”?	Policy revised to: 1. A 9-1-1 – ALS paramedic will be considered INACTIVE if any conditions listed in Section VI. 2 are not satisfied. 2. An IFT-ALS paramedic will be considered INACTIVE if any conditions listed in Section VI. 3 are not satisfied. 3. An Air Medical paramedic will be considered INACTIVE if any conditions listed in Section

				<i>VI. 4 are not satisfied.</i> See previous response provided for same/similar comment.
12-17-13	Cathy Ord	Newport Beach Fire Department	<u>Page 2; V.1.D. 2. Only OCEMS, The OC Paramedic Training Program, an OC base hospital coordinator or an OC ALS service provider EMS coordinator may provide items a, b and c above</u> We support this standard.	Acknowledged.
12-17-13	Cathy Ord	Newport Beach Fire Department	<u>Page 2; old section G New graduates of an Orange County paramedic training program are exempt from items E., F., G., and H. of this section if applying for accreditation within six (6) months of graduation.</u> What is the rationale for deleting this item? This means that we have to do an ALS Airway review class, review of local optional scope of practice for which the individual has not been trained and tested, completion of 10 ALS responses, and pay a fee on all of our new grads from Saddleback.	See previous response provided for same/similar comment.
12-17-13	Cathy Ord	Newport Beach Fire Department	<u>Page 3; VI. 2. C. Demonstrate sufficient patient contact experience through participation in the OC EMS system-wide continuous quality improvement plan.</u> Need further clarification on what constitutes sufficient patient contact.	See previous response provided for same/similar comment.

			Is it based on a certain number of patient contacts or a certain number of procedures entered and their success rate?	
12-17-13	Cathy Ord	Newport Beach Fire Department	<u>Page 4; VII Inactive Status: A 911-ALS paramedic will be considered INACTIVE if any conditions listed in section VI. #1 are not satisfied.</u> What constitutes “sufficient”?	See previous response provided for same/similar comment.

OCEMS Policy #720.00 Section 304 Ground Ambulance Provider Policies, Procedures, Documentation

Date	Contact	Organization	Comment	OCEMS Response
12-10-13	Bill Weston	AAOC	<u>New Section A.</u> - EMS Agency should not reference a specific driver training school. Both EVOC and National Safety Council programs are private schools. EMS Agency should require a program of drivers training. It should be up to provider to determine which program or school meets their needs. <u>Section E</u> - Provider should be required to have a CE Plan. That plan should not require that the provider be a CE provider only that they have a CE Plan. <u>Section F</u> - CCT Ambulance should not require two (2) EMTs. There is no staffing requirement for a NICU or PICU ambulance. <u>Section G</u> - Please specify that push to talk mobile phones are not radios as used in this policy. Please identify what NAEMD, EMD and ETC are.	Acknowledged. Policy revised to: <i>"OCEMS approved ambulance driver training program"</i> Acknowledged. Policy revised to: <i>"Continuing education plan for employees."</i> Delete: <i>"and evidence that the applicant has minimum of one employee who is qualified by education and experience in materials, evaluation, and methods of instruction."</i> Acknowledged- OCEMS Comment: Orange County Standard is two (2) EMT's Acknowledged. Policy revised, added: <i>"Note- Push-to-talk mobile phones are not considered two way radio equipment as described in this section"</i> Policy revised, added: <i>"National Association of Emergency Medical Dispatchers (NAEMD), Emergency Medical Dispatch (EMD), Emergency Telecommunicator Course (ETC)"</i>

			<u>Section T</u>- This is not necessary. Many ambulance companies in OC get their updated information through AAOC meetings. Attendance at Transportation Advisory Subcommittee meeting is not required. <u>Section X</u> - Zoning is a specific function reversed for a City not the County, except in County unincorporated areas. Delete section. <u>Section Y</u> - You need to define what a "patient drop" is. Suggest adopting a policy that requires notification if a patient sustains an injury. You also need to define what an "investigation" is. Both MediCare and MediCal perform routine audits of all payors. Would that be an investigation? <u>Section Z</u> - Please delete this section as it is overbroad.	Acknowledged- OCEMS Comment: Not all ambulance providers are members of the AAOC. Orange County TAC provides opportunities to address OCEMS related business specific to licensed ambulances operating within the county. Acknowledged- OCEMS Comment: Section is specific to the requirement of documentation as evidence of compliance with zoning requirements for the business location. Acknowledged. Policy revised, Deleted: <i>"Patient is dropped"</i> Acknowledged. Policy revised, Added: <i>"(Does not include routine audit)"</i> Acknowledged- OCEMS Comment: Additional information may be needed in the course of support of licensure. Policy revised: <i>"Any information requested by EMS Agency"</i>
12-17-13	Jimmy McNeal	Schaefer Ambulance Service, Inc.	attached is a word file with comments for 720.302, 304, 306 43.10 and xxx.xx	See next line for submitted comment.
12-17-13	Jimmy McNeal	Schaefer Ambulance Service, Inc.	<u>720.00 Section 304 Section N.</u> What is the agencies definition of a	Acknowledged. Policy revised: <i>"Operations Manager or equivalent should have a</i>

			progressive EMS experience? Is everyone on the management team required to have this experience or are you looking for a percentage of the staff having this experience? (Ex: 50%, 75% or 90%)	<i>minimum five years supervisory experience in EMS."</i>
12-16-13	Matt Armstrong	MedCoast Ambulance Service	<u>Section I. A.</u> Should not dictate what what driving course. There are many to choose from <u>Section I. E.</u> Require a plan. What if this is out sourced? Do not dictate in house employee. <u>Section I. G.</u> What is an equivalent to ReddiNet? Is there one? <u>Section I. T.</u> Is this really necessary? Any quality company will attend. <u>Section I. X.</u> Proof of location? This is the responsibility of the city. <u>Section I. Y.</u> Delete dropped. Too many definitions of this action What is an investigation? Is it a routine Audit?	See previous response provided for same/similar comment. See previous response provided for same/similar comment. Acknowledged-OCEMS Comment: Currently ReddiNet is the only OCEMS approved provider in Orange County. Other systems may be able to satisfy requirements and could be used if approved by OCEMS. See previous response provided for same/similar comment. See previous response provided for same/similar comment. See previous response provided for same/similar comments.

12-17-13	Robert Viera	Care Ambulance Service, Inc.	<u>I. A.</u> - Define EVOC prior to its use in policy or spell it out as emergency vehicle operations course. <u>I. F.</u> - Some specialty ambulances with contracted hospitals utilize a NICU or PICU team and 1 EMT. This policy appears to prohibit that configuration which add a significant cost to operating to meet the already established contractual obligations. This policy does not allow for alternate configurations that could be used to mitigate the changes occurring in healthcare as a result of the Affordable Care Act. One example would be the use of an RN and an EMT staffing the ambulance. Recommendation for I.F.: Please delete or state staffing must demonstrate the ability to provide proper patient care. If referring to another policy in a policy please cite what policy is being referenced. <u>I.G. paragraph 2</u> - Does a push to talk cell phone meet the two-way radio standard? Currently CAAS (Commission on Accreditation of Ambulance Services) accepts push to talk phones that are programmed to hail the ambulance dispatch center upon activation. CAAS section 204.01.02 Recommendation I.G paragraph 2: The policy correspond with the CAAS standard section 204.01.02 <u>I.G. paragraph 5</u> - Please spell out the	See previous response provided for same/similar comment. See previous response provided for same/similar comment. See previous response provided for same/similar comment. See previous response provided for same/similar
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			acronyms NAEMD, EMD, and ETC. <u>I. X.</u> - Please delete, it is not the responsibility of the County to enforce city codes/laws. <u>I. Y.</u> - Please define "patient drop". Perhaps a patient drop is reportable when an injury has occurred. Please define "investigation". Would OC EMS consider an scheduled or non-scheduled audit by another agency reportable? <u>I.Z.</u> - Please delete. Too vague.	comment. See previous response provided for same/similar comment. See previous response provided for same/similar comment. See previous response provided for same/similar comment.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>General Comment</u> Based on past history, OFD believes that the various sections of Policy 720.00 out for public comment continue to apply only to private ambulance providers. If that is not correct, it is a change that needs to be stated clearly, not left for the reader to infer. New language in section 300 "<i>(optional for ambulances operated by a public agency)</i>" appears to indicate that the intent is that these policies do apply to public agencies except where specifically noted.	Acknowledged. Policy revised- added to the #720 policies: <i>"Policy sets minimum acceptable standards, any exemptions for public providers allowed by law."</i> Policy revised- delete references in #720 policies: <i>"optional for ambulances operated by a public agency"</i>
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 1; 1. Old F & New D F.</u> <u>Evaluation/orientation process for supervisors including, but not limited to call paramedics. G.D. Ensuring ambulance attendants' ensuring compliance with the</u>	

			<u>requirements of the Ordinance and/or Rules and Regulations.</u> It appears these two sections were supposed to be joined?	Acknowledged. Policy revised: <i>“Evaluation/orientation process for supervisors including, but not limited to, ensuring compliance with the requirements of the Ordinance and/or Rules and Regulations.”</i>
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 2; E. E. ...evidence that the applicant has minimum of one employee who is qualified by education and experience in materials, evaluation and methods of instruction.</u> Does this allow the provider to hire a contractor to provide their EMS CE?	See previous response provided for same/similar comment
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 2; F. 4th bullet</u> • <u>One dedicated dispatcher at the 24 hours/day (i.e. this dispatcher cannot also perform transports).</u> There appears to be a word missing between “the” and “24”.	Acknowledged. Policy revised: <i>“One dedicated dispatcher at the dispatch center 24 hour/day....”</i>
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 2; G. 1st Bullet</u> • <u>Ambulance service providers shall demonstrate that they have a computer-aided dispatch software system (“CAD”) that has the ability to collect all of the required data elements needed to dispatch the ambulance provider’s ambulances. Such CAD software should</u>	

			<u>have the ability to record all of the call times (time stamping function) and the provider should be required to demonstrate the capability of generating electronic reports comprised of specific CAD data, including patient transports, cancelled calls, response time performance, etc.</u> Does this apply to every call or just 911 responses?	Acknowledged- OCEMS Comment: Section applies to all calls.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 3; M. M. Documentation showing automobile liability insurance for combined single limit \$1,000,000 and comprehensive professional liability insurance policies with minimum insurance levels of \$1,000,000 per occurrence, with a \$3,000,000 aggregate on both.</u> This should not apply to Public Providers (Cities) who are self insured.	See previous response provided for same/similar comment.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 4; P P. Personnel Uniform Standards: Ambulance service providers shall have policies in place that insure all their on-duty EMS personnel will wear a professional EMS style uniform with the company's name and employee name depicted on the uniform and/or company ID badge.</u> This should not apply to Fire Department Personnel wearing department authorized	Acknowledged- OCEMS Comment: Section references ambulance service provider policies on personnel uniform standards.

			apparel (T-Shirt) and/or safety gear such as turnouts.	
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 4; R. R. Additionally, the QA/QI plan shall include but not be limited to, an educational component on appropriate medical billing and billing fraud, emergency transport of BLS patients and other required QA/QI elements per OC EMS policies.</u> Is OC EMS overstepping their role by dictating content of QI Plans and Educational content provided by the employer when it comes to issues that are the responsibility of other regulatory/government entities to investigate and enforce?	Acknowledged-OCEMS Comment: This was requested by representatives of CMS and FBI.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 4; T. T. A policy showing it is mandatory for a representative from each company to attend 50% of the OC EMS Transportation Advisory Subcommittee meetings each calendar year.</u> What is the ramification if a representative does not attend 50% of the meetings? Would they be suspended?	Acknowledged-OCEMS Comment: Suspension can be considered with notification of appropriate authorities.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 4; U. U. Ambulance service providers shall be required to demonstrate satisfactory compliance with all infectious disease, blood born and airborne pathogen control plans as required by federal and state regulations.</u>	

			OSHA is the regulatory agency responsible for determining satisfactory compliance. Have they passed this responsibility to OCEMS? While I understand the desire is to make sure employees are protected properly, does OC EMS have the authority to oversee this for OSHA?	Acknowledged- OCEMS Comment: Section is specific to the requirement of documentation as evidence of compliance with standards related to infection control, bloodborne and airborne pathogen control plans.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 4; V. Y. Policies showing the EMS Agency will be notified within 72 hours of any of the following situations:</u> • <u>Patient is dropped.</u> • <u>Ambulance is involved in an accident where one or more participants (employees, patients, occupants of other vehicles) are transported to a hospital.</u> What is the rationale for OC EMS being notified of a patient being dropped or an ambulance being involved in an accident? Granted these would be sentinel events for the provider. Why would OC EMS need this information? What would they do with this information? What purpose does reporting it to OC EMS accomplish? Would it affect licensure or is it something the provider should be including in their QI plan under sentinel events and handling in-house?	Acknowledged- OCEMS Comment: These are sentinel events tracked by Agency and Provider to protect public health and safety.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 5; Z. Z. Any further information requested by the EMS agency.</u>	

			This is a pretty open ended statement. How does it apply? Is it further information specific to one of the points covered in this section of Policy 720.00, or does it mean ANY information ANY employee of OC EMS requests for ANY reason?	See previous response provided for same/similar comment.
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>General Comment</u> Based on past practice, Nbfd believes that the 720.00 series policies out for public comment do not apply to public agencies. If the practice has changed, that needs to be stated clearly. New language in section 300 “optional for ambulances operated by a public agency” appears to indicate that the intent is that these policies do apply to public agencies except where specifically noted. Please clarify.	See previous response provided for same/similar comment.
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>Page 2; E. E. ...evidence that the applicant has minimum of one employee who is qualified by education and experience in materials, evaluation and methods of instruction.</u> This language does not allow for the provider to hire a contractor to provide EMS CE.	See previous response provided for same/similar comment.
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>Page 2; F. 4th bullet One dedicated dispatcher at the 24 hours/day (i.e. this dispatcher cannot also perform transports).</u>	

			Needs clarification.	See previous response provided for same/similar comment.
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>Page 3; M. Requirement regarding the documentation of liability insurance.</u> This would not apply to public agency providers who are self-insured.	See previous response provided for same/similar comment.
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>Page 4; P Personnel Uniform Standards: Ambulance service providers shall have policies in place that insure all their on-duty EMS personnel will wear a professional EMS style uniform with the company's name and employee name depicted on the uniform and/or company ID badge.</u> This would not apply to public agency personnel wearing department authorized apparel (T-Shirt) and/or safety gear such as turnouts.	See previous response provided for same/similar comment.
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>Page 4; R. Additionally, the QA/QI plan shall include but not be limited to, an educational component on appropriate medical billing and billing fraud, emergency transport of BLS patients and other required QA/QI elements per OC EMS policies.</u> Need clarification on why appropriate medical billing practices and billing fraud should be a required by OCEMS	See previous response provided for same/similar comment.

12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>Page 4; T. A policy showing it is mandatory for a representative from each company to attend 50% of the OC EMS Transportation Advisory Subcommittee meetings each calendar year.</u> While it is beneficial for system integration, what are the ramifications of non-compliance?	See previous response provided for same/similar comment.
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>Page 4; U. Ambulance service providers shall be required to demonstrate satisfactory compliance with all infectious disease, blood born and airborne pathogen control plans as required by federal and state regulations.</u> This is required by OSHA regulation. Need clarification on why this has become a requirement for OCEMS.	See previous response provided for same/similar comment.
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>Page 4; Y Policies showing the EMS Agency will be notified within 72 hours of any of the following situations:</u> • <u>Patient is dropped.</u> • <u>Ambulance is involved in an accident where one or more participants (employees, patients, occupants of other vehicles) are transported to a hospital.</u> <u>The company is informed that a governmental agency (federal, state, county or local) has initiated an investigation</u> Need clarification on why these 3 situations have been singled out. Are these regulatory requirements? Otherwise, it may be	See previous response provided for same/similar comment.

			beneficial to list all sentinel event-type of situations that should be reported to OCEMS under item "R" of this section, similar to Policy 385.05 Base Hospital Incident Review Process, item III.E.3.	
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>Page 5; Z. Any further information requested by the EMS agency.</u> Need clarification as to what other type of information this could entail.	See previous response provided for same/similar comment.

OCEMS Policy #720.00 Section 600 Prehospital Air Ambulance and Air Rescue Service

Date	Contact	Organization	Comment	OCEMS Response
12-10-13	Bill Weston	AAOC	No Comments	Acknowledged.
12-17-13		Lynch EMS	No Comment	Acknowledged.
12-17-13	Orange City Fire	Orange City Fire	<u>General Comment</u> Based on past history, OFD believes that the various sections of Policy 720.00 out for public comment continue to apply only to private ambulance providers. If that is not correct, it is a change that needs to be stated clearly, not left for the reader to infer. New language in section 300 "<i>(optional for ambulances operated by a public agency)</i>" appears to indicate that the intent is that these policies do apply to public agencies except where specifically noted.	Acknowledged- OCEMS Comment: Policy 720.00 Section 600 Applies to Air Ambulance and Air Rescue Service Providers. California Code of Regulations establishes regulatory requirements for Prehospital EMS Aircraft. These regulatory requirements are applicable to both private and public providers.

12-17-13	Orange City Fire	Orange City Fire	Numbering is off. III is used twice.	Acknowledged. Policy Revised- Reformatted.
12-17-13	Orange City Fire	Orange City Fire	<u>Page 5; 4.D.4 EMS Aircraft Providers will operate on Aircraft capable of "Hot Load" Capable</u> Typo/redundant	Acknowledged Policy Revised: "EMS Aircraft Providers will operate an Aircraft capable of "Hot-Loading" patients"
12-17-13	Orange City Fire	Orange City Fire	<u>Page 5; 4.D.5.? EMS Aircraft Providers will implement the use of Night Vision Goggle (NVG) or Night Vision Imaging systems for night operations</u> Is there a deadline for implementation?	Acknowledged- OCEMS Comment: Current OCEMS licensed EMS Aircraft Providers operating in Orange County have implemented the use of Night Vision Goggle or Night Vision Imaging systems for night operations. Therefore, the implementation date would be the same as the effective policy date to maintain the current standard already in place within Orange County.

OCEMS Policy #720.00 Section 602 Prehospital Air Ambulance and Air Rescue Service Activation Procedure

Date	Contact	Organization	Comment	OCEMS Response
12-10-13	Bill Weston	AAOC	No Comments	Acknowledged.
12-17-13		Lynch EMS	No Comment	Acknowledged.
12-17-13	Orange City Fire	Orange City Fire	No Comment	Acknowledged.

OCEMS Policy #720.00 Section 704 Air Ambulance Air Medical Paramedic Accreditation

Date	Contact	Organization	Comment	OCEMS Response
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12-20-13	Bill Weston	AAOC	No Comments	Acknowledged.
12-17-13		Lynch EMS	All Paramedic Accreditation should be handled consistently in accordance with EMSA Guideline 130	See previous response provided for same/similar comment.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>General Comment</u> Based on past history, OFD believes that the various sections of Policy 720.00 out for public comment continue to apply only to private ambulance providers. If that is not correct, it is a change that needs to be stated clearly, not left for the reader to infer. New language in section 300 “<i>(optional for ambulances operated by a public agency)</i>” appears to indicate that the intent is that these policies do apply to public agencies except where specifically noted.	Acknowledged- OCEMS Comment: Air Ambulance Air Medical Paramedic Accreditation is specific to EMS Aircraft Providers. Paramedic accreditation applies to private and public paramedics providing paramedic level care in Orange County.
12-17-13	Orange City Fire	Orange City Fire	<u>Page 2; III B.c. Demonstrate sufficient patient contact experience through participation in the OCEMS system-wide continuous quality improvement plan</u> We request further clarification of this item. 1. What constitutes “sufficient” 2. “participation in the OC EMS system-wide continuous quality improvement plan” what exactly does this mean? Does the statement apply to the air ambulance provider or the individual paramedic? Is it based on a certain number of patient	See previous response provided for same/similar comment.

			contacts or a certain number of procedures entered and their success rate? Is it based on a certain number and type of QI fallout identified by the air ambulance provider? We suggest “sufficient” should not be based upon certain procedures entered that would require duplicate data entry as the Image Trend software functions today. Example: If a pulse ox result is documented, the field provider should not be required to also document pulse ox monitoring in the procedures section. The same is true for cardiac monitoring, blood glucose testing, and other procedures such as BVM ventilation that requires documentation of oxygen administration via PPV in the medication section. The software should be able to enter the procedure as being performed when the result is documented or the medication is entered.	
12-17-13	Cathy Ord	Newport Beach Fire Department	<u>General Comment</u> Based on past practice, NBFD believes that the 720.00 series policies out for public comment do not apply to public agencies. If the practice has changed, that needs to be stated clearly. New language in section 300 “optional for ambulances operated by a public agency”	See previous response provided for same/similar comment.

			appears to indicate that the intent is that these policies do apply to public agencies except where specifically noted. Please clarify.	
12-17-13	Cathy Ord	Newport Beach Fire Department	<u>Page 2; III B.c. Demonstrate sufficient patient contact experience through participation in the OCEMS system-wide continuous quality improvement plan.</u> Need further clarification on what constitutes sufficient patient contact. Is it based on a certain number of patient contacts or a certain number of procedures entered and their success rate?	See previous response provided for same/similar comment.

OCEMS Policy #720.00 Section 200 Complaint Procedure

Date	Contact	Organization	Comment	OCEMS Response
12-10-13	Bill Weston	AAOC	Section C - b - "The license may be suspended during the hearing process is too vague. Please insert similar language that the license may be suspended if the Agency determines their is imminent risk to the public health, safety or welfare.	Acknowledged. Policy Revised: <i>"If the alleged violation is deemed an imminent risk to public health, safety, and welfare, a license may be immediately suspended"</i>
12-17-13		Lynch EMS	We support the inclusion of suspension of company licensure during the hearing process for organizations found to be in substantial violation of the Ambulance Ordinance	Acknowledged.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>General Comment</u> Based on past history, OFD believes that the various sections of Policy 720.00 out for public comment continue to apply only to private ambulance providers. If that is not correct, it is a change that needs to be stated clearly, not left for the reader to infer. New language in section 300 " <i>(optional for ambulances operated by a public agency)</i> " appears to indicate that the intent is that these policies do apply to public agencies except where specifically noted.	See previous response provided for same/similar comment.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 1; C. C. Upon receipt of a written complaint from any person or organization, or a complaint initiated by the OCEMS Medical Director Health Officer or an OCEMS</u>	

			<u>person, OCEMS staff shall take the following actions:</u> Suggest “employee” or “designated OCEMS Personnel” rather than person.	Acknowledged. Policy Revised: <i>“Upon receipt of a written complaint from any person or organization, or a complaint initiated by the OCEMS Medical Director, or his or her designee, OCEMS shall take the following actions:”</i>
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 2; b. Top of page. The complaint shall be referred to OCEMS Medical Director for resolution in accordance with Title 22 of the California Code of Regulations and OCEMS Policy and Procedure 460.00 "Prehospital Personnel: License, Accreditation, and Certification Review Process."</u> • Numbering appears to be missing. What if the complaint isn't about an employee – for example it's about an unsafe vehicle, an equipment issue or billing practices/fees?	Acknowledged. Policy Revised: Reformatted Acknowledged. Policy Revised: <i>“The complaint shall be referred to OCEMS Medical Director for resolution in accordance with Title 22 of the California Code of Regulations and OCEMS policies and procedures.”</i> Deleted- <i>“OCEMS Policy and Procedure 460.00 "Prehospital Personnel: License, Accreditation, and Certification Review Process.”</i>
12-17-13	Suzanne Goodrich	Orange City Fire	<u>In General</u> <u>In some sections (b at the top of page 3) it says OCEMS will use certified mail.</u> <u>OCEMS staff shall send by certified mail a copy of the complaint to the licensee with a letter requesting the licensee to respond in writing within fifteen (15) calendar days of the licensee's receipt of the complaint</u> It does not specify use of certified mail consistently throughout the document. Page	Acknowledged. Policy Revised: Language standardized throughout policy for consistency.

			2, d.2). (b).; Page 7,1) a) and Page 7, 1) b). <i>The Health Officer OCEMS Medical Director or designee shall send a Notice of Correction to the licensee</i>	
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 3; d. After fifteen (15) calendar days have elapsed or after the licensee has responded within the 15 day limit and OCEMS staff investigation is completed, OCEMS staff shall prepare a written report regarding the complaint.</u> Is there a limit to how long OCEMS has to complete their investigation? If this policy applies to public providers, would need to add language acknowledging the need for the provider to work with the OCEMS Medical Director and comply with FBOR criteria.	Acknowledged- OCEMS Comment: Circumstances related to complaints and investigations vary from case to case.
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>General Comment</u> Based on past practice, NBFD believes that the 720.00 series policies out for public comment do not apply to public agencies. If the practice has changed, that needs to be stated clearly. New language in section 300 “optional for ambulances operated by a public agency” appears to indicate that the intent is that these policies do apply to public agencies except where specifically noted. Please clarify.	See previous response provided for same/similar comment.

12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>General Comment</u> <u>In some sections (b at the top of page 3) it says OCEMS will use certified mail.</u> <u>OCEMS staff shall send by certified mail a copy of the complaint to the licensee with a letter requesting the licensee to respond in writing within fifteen (15) calendar days of the licensee's receipt of the complaint.</u> Needs further clarification. The use of certified mail is not consistent throughout the document. Page 2, d.2). (b).; Page 7,1) a) and Page 7, 1) b). <i>The Health Officer OCEMS Medical Director or designee shall send a Notice of Correction to the licensee.</i>	See previous response provided for same/similar comment.
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>Page 1; C. Upon receipt of a written complaint from any person or organization, or a complaint initiated by the OCEMS Medical Director Health Officer or an OCEMS "person", OCEMS staff shall take the following actions:</u> Suggest "employee" or "designated OCEMS Personnel" rather than person.	See previous response provided for same/similar comment.
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>Page 2; b. Top of page.</u> <u>The complaint shall be referred to OCEMS</u>	

			<u>Medical Director for resolution in accordance with Title 22 of the California Code of Regulations and OCEMS Policy and Procedure 460.00 "Prehospital Personnel: License, Accreditation, and Certification Review Process."</u> The complaint filed may not be about an employee – for example it's about an unsafe vehicle, an equipment issue or billing practices/fees?	See previous response provided for same/similar comment.
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>Page 3; d.</u> <u>After fifteen (15) calendar days have elapsed or after the licensee has responded within the 15 day limit and OCEMS staff investigation is completed, OCEMS staff shall prepare a written report regarding the complaint.</u> Is there a limit to how long OCEMS has to complete their investigation? If this policy applies to public agency providers, it would need to comply with FBOR legislation.	See previous response provided for same/similar comment.

OCEMS Policy #720.00 Section 300 Ground Ambulance Design/Documentation/Equipment

Date	Contact	Organization	Comment	OCEMS Response
12-10-13	Bill Weston	AAOC	<u>Section III B</u> - We agree with this concept, we just ask that we use the exact same language that is used by the LA County EMS Agency.	Acknowledged.

			Most ambulance companies that operate in OC also operate in LA County. <u>Section IV. D</u> - Please delete. With current electronic odometers there is no need for this certification. Old mechanical odometers could be tampered with not current electronic odometers. If this section stays as written should apply to all ambulance providers. <u>Section IV. E</u> - Should apply to all ambulance providers.	Acknowledged- OCEMS Comment: Other providers have requested to retain mechanical odometer checks. Electronic odometers can be subjected to digital tampering. Acknowledged.
12-16-2013	Matt Armstrong	MedCoast Ambulance Service	<u>III. B.</u> Ambulance Design With many compaines working multi-county it would be beneficial to mirror the Los Angeles County Ordinance regarding age of vehicle limitations.	See previous response provided for same/similar comment.

			<u>IV. D.</u> If private providers are are required to obtain an odometer inspection, why aren't the public agencies held to the same standard? <u>IV. E.</u> If private providers are are required to obtain a radio inspection, why aren't the public agencies held to the same standard?	See previous response provided for same/similar comment. Acknowledged.
12-17-13	Robert Viera	Care Ambulance Service, In.	<u>IV. D.</u> - Please delete. The advent of the electronic odometer has made this time consuming and costly process unnecessary. Public agencies have the ability to charge by the mile. What is the reason for their exempt status from this policy and <u>IV.E.</u>?	See previous response provided for same/similar comment. OCEMS Comment: Comment of “?” is non-specific, OCEMS is unable to respond.

12-17-13		Lynch EMS	We encourage the use of 10 years, being from the date that a new ambulance is placed into service. Example: a brand new chasis that has been sitting for a year a Leader before it has a modular compartment installed should be considered new.	See previous response provided for same/similar comment.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 1; III.D.</u> <u>D. No ambulance shall be operated if staffed at less than the level of care marked on the unit, (i.e., "ALS," "Mobile Intensive Care Unit," or "MICU" – must be staffed by paramedics or registered nurses).</u> This does not specify whether 1 or 2 paramedics are required when there is no RN staffing the unit.	Acknowledged- OCEMS Comment: Policy section is specific to ambulance advertising/information. Staffing levels are defined in OCEMS policies specific to personnel requirements.
12-17-13 	Suzanne Goodrich	Orange City Fire	<u>Page 2; III. E. 7.</u> <u>7. The name of the public entity that operates an emergency provides ambulance service or the name under which the ambulance licensee is doing business or providing service shall be displayed on both sides and the rear of each emergency ambulance. The display of the name shall be in letters in sharp contrast to the background and shall be of such size, shape, and color as to be readily legible during daylight hours from a distance of 50 feet. All ambulances operated under a single license shall display the same identification.</u> This is confusing. Are you referring to a	Acknowledged. Policy Revised (Language consistent 13 CCR § 1100.4): <i>"The name of the public entity that operates an emergency ambulance service or the name under which the ambulance licensee is doing business or providing service shall be displayed on both sides and the rear of each emergency ambulance. The display of the name shall be in letters in sharp contrast to the background and shall be of such size, shape, and color as to be readily legible during daylight hours from a distance of 50 feet. All ambulances operated under a single license shall display the same identification."</i>

			Public (Fire Department) Ambulance Provider or a Private ambulance provider?	
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 2; IV. C, D and E.</u> <u>C. Proof of passage of annual vehicle inspection performed by California Highway Patrol within the preceding twelve (12) months. (optional for ambulances operated by a public agency).</u> <u>D. Proof of passage of current odometer inspection(s) performed by the Division of Weights and Measures of the Agriculture Department of the County of Orange or other California county. (optional for ambulances operated by a public agency).</u> <u>E. Proof of passage of an initial and upon request Med 9 radio inspection(s) performed by the County of Orange Sheriff Coroner's Department of Communications. (optional for ambulances operated by a public agency).</u> In the past, it was understood that the Ambulance Rules and Regulations did not apply to Public ambulance providers in O.C. Although they did not apply, the OFD chose to have our ambulances inspected by OC EMS and mirrored the fees established by the OC Board of Supervisors.	See previous response provided for same/similar comment.

			If OC EMS is specifically stating that these three items are optional for public providers, does that mean that every other item in this and all of the Ambulance Rules and Regulations Sections out for public comment will now apply to public providers?	
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 3; V. A. 2. e. AMBULANCE MEDICAL EQUIPMENT:</u> <u>Rolled gauze bandages: (6) of varying sizes</u> What is the rationale for requiring varying sizes of rolled gauze? For decades, 3” woven gauze rolls (Kerlix) have been used very effectively. Having to carry multiple sizes will require additional storage space and involve additional cost to the provider. It is unclear that there is any benefit associated with this requirement. Certainly a provider could carry multiple sizes if they desire to do so, but is it necessary to require every one do so?	Acknowledged. Policy Revised: <u>“Rolled gauze bandages: minimum six (6) total with three (3) of the six to be 3 inch in size.”</u>
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 4; V.A.2.g. AMBULANCE MEDICAL EQUIPMENT:</u> <u>Adhesive tape rolls; 1” and 2” or 3” width: (2) per size</u> Possibly this is just a terminology issue, Is “Adhesive” tape being used in a generic way or to describe heavy cloth adhesive tape as	Acknowledged. Policy Revised: <u>“Medical adhesive tape: minimum six (6) total with three (3) of the six to be 2 inch in size.”</u>

			opposed to paper tape, dermaclear tape, etc. Should we be using tape that is less prone to allergies and skin damage?	
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 5; VI. B.</u> <u>B. Ambulance personnel should not respond to an incident requiring PPE beyond their level of training, without adhering to published standards</u> We suggest deleting the highlighted text. What does “without adhering to published standards” add to the statement. If personnel haven’t been trained they shouldn’t use it	Acknowledged. Policy Revised: <i>“Ambulance personnel should not respond to an incident requiring PPE beyond their level of training.”</i> Deleted: <i>“, without adhering to published standards”</i>
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 6; VI.D. 3.</u> <u>Hearing protection, ear plugs or other: (2) sets (cannot be worn while operating vehicle).</u> Headsets for hearing protection should be worn while responding code 3 to protect employees hearing. Please clarify why it should not be worn while operating the vehicle.	Acknowledged. Policy Revised: <i>“Hearing protection, ear plugs or other: (2) sets.”</i> Deleted: <i>“(cannot be worn while operating vehicle).”</i>
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 6; VI.D. 8.</u> <u>8. NIOSH approved (N95) or (N100) filter respirators: (6)</u>	

			N95 <i>AND</i> N-100 or P100 Respirators must be provided. N95's are worn whenever there is a known or suspected case of airborne transmissible disease/pathogen. N-100 or P-100's are worn if a high hazard procedure is being performed on that patient and the employee is within 3-6 feet of the patient. It is conceivable that a breathing treatment, suctioning, intubation or bag/mask ventilation will be performed within 3-6 feet of ambulance personnel (during transport). An employer could choose to provide only N100's or P100's (at greater expense) in lieu of providing N-95's but could not choose to provide only N95's in lieu of N100 or P100's. Fit testing is required for N95's, N100's and P100's.	Acknowledged. Policy Revised: <i>"NIOSH approved (N95) and (N100 or P100) filter respirators: six (6) of each N95 and N100 or P100."</i>
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 6; VII.</u> <u>Required PPE Training – This entire section.</u> We do understand that the intent of OCEMS is positive, they want to ensure employees are protected. Has OSHA requested OC EMS to monitor and enforce their regulations (Ref. 26 CFR 1910.132[f])? Does OCEMS have statutory Authority to take responsibility for monitoring this? If OCEMS determines that an ambulance provider is not in compliance,	Acknowledged- OCEMS Comment: Section is specific to the requirement of standards and documentation as evidence of compliance with standards related to PPE Training.

			what actions will OCEMS take? Report to OSHA, revoke a provider's license, impose a fine?	
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>Page 1; III.D.</u> <u>D. No ambulance shall be operated if staffed at less than the level of care marked on the unit, (i.e., "ALS," "Mobile Intensive Care Unit," or "MICU" – must be staffed by paramedics or registered nurses).</u> Needs further clarification. Does the terminology marked on the unit also refer to the number of paramedics staffed on a unit" E.g. "ALS" means the unit is staffed with 2 paramedics.	See previous response provided for same/similar comment.
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>Page 2; III. E. 7.</u> <u>Needs further clarification. Does public entity refer to a public agency Fire Department Ambulance Provider or a Private ambulance provider?</u> <u>7. The name of the public entity that operates an emergency provides ambulance service or the name under which the ambulance licensee is doing business or providing service shall be displayed on both sides and the rear of each emergency ambulance. The display of the name shall be in letters in sharp contrast to the background and shall be of such size, shape, and color as to be readily legible during daylight hours from a distance of 50 feet. All ambulances operated under a single license</u>	See previous response provided for same/similar comment.

			<u>shall display the same identification</u> Needs further clarification. Does public entity refer to a public agency Fire Department Ambulance Provider or a Private ambulance provider?	
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>Page 2; IV. C, D and E.</u> <u>C. Proof of passage of annual vehicle inspection performed by California Highway Patrol within the preceding twelve (12) months. (optional for ambulances operated by a public agency).</u> <u>D. Proof of passage of current odometer inspection(s) performed by the Division of Weights and Measures of the Agriculture Department of the County of Orange or other California county. (optional for ambulances operated by a public agency).</u> <u>E. Proof of passage of an initial and upon request Med 9 radio inspection(s) performed by the County of Orange Sheriff Coroner's Department of Communications. (optional for ambulances operated by a public agency).</u> In the past, it was understood that the Ambulance Rules and Regulations did not apply to Public ambulance providers in O.C. If OC EMS is specifically stating that these three items are optional for public providers,	See previous response provided for same/similar comment.

			does that mean that every other item in this and all of the Ambulance Rules and Regulations Sections out for public comment will now apply to public providers?	
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>Page 6; VI.D. 3.</u> <u>Hearing protection, ear plugs or other: (2) sets (cannot be worn while operating vehicle).</u> Headsets currently used by our fire department are for hearing protection to be worn while responding code 3.	See previous response provided for same/similar comment.
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>Page 6; VI.D. 8 8. NIOSH approved (N95) or (N100) filter respirators: (6)</u> An employer could choose to provide only N100s or P100s (at greater expense) in lieu of providing N-95s but could not choose to provide only N95s in lieu of N100s or P100s. Need to include P100s, since many providers still have ample supplies in stock	See previous response provided for same/similar comment.
12-17-2013	Cathy Ord	Newport Beach Fire Department	<u>Page 6; VII.</u> <u>Required PPE Training – This entire section.</u> This is required by OSHA regulation. Need clarification on why this has become a requirement for OCEMS.	See previous response provided for same/similar comment.

OCEMS Policy #720.00 Section 302 Ground Ambulance Communication Equipment

Date	Contact	Organization	Comment	OCEMS Response
12-10-13	Bill Weston	AAOC	<u>Section II B.</u> Please delete this entire section. There is no need for the Med 9 radio to be on unless in operations. OCC does not communicate directly with on-duty ambulances and has no way of knowing what ambulances are on-duty or assigned to an incident. <u>Section IV. C -</u> Please delete. There is no way to accurately measure a companies compliance. The current method is too subjective and is dependant on the radio equipment operated by the OC EMS Agency. It is also dependant on the EMS Agency radio operator. <u>New Section V.</u> You have two sections IV. Section B Radio Codes - Please delete, Radio codes are not used in EMS radio transmissions. <u>Section V or VI</u> , 1 Radio Operational Procedures - These listed procedures are not consistent with pratices of Metro Net and OCFA Dispatch Center. They also directly conflict with Section H above. Suggest changing wording to using procedures consistent with Fire Department Dispatch Center procedures.	Acknowledged- OCEMS Comment: No substantial change from previous policy other than change from Med 10 to Med 9 Acknowledged- OCEMS Comment: No substantial change from previous policy. Acknowledged. Policy Revised: Reformatted Deleted Section: "IV B. Radio Codes" Acknowledged. Policy Revised-Deleted Section: "A-1 Radio Operational Procedures"
12-17-2013	Jimmy McNeal	Schaefer Ambulance	attached is a word file with comments for	See next line(s) for submitted comment.

		Service, Inc.	720.302, 304, 306 43.10 and xxx.xx	
12-17-2013	Jimmy McNeal	Schaefer Ambulance Service, Inc.	<u>720.00 Section 302 Section C 1.</u> This statement was already made in Section A 1. Is it the agencies intention to repeat statements under each section? We felt it was redundant and left in on accident and thought we would bring it to your attention. <u>Section V subsection A.</u> Is there a possibility of allowing other radio manufacturers the opportunity to provide service? In the past OCFA only allowed Motorola 800 Mhz radio's to be used which was very expensive. <u>Subsection G.</u> This section should have some reference to 911 contracted providers. If you read it without going through the entire document, it leads the reader into believing a 800 Mhz radio is required on each unit.	Acknowledged. Acknowledged- OCEMS Comments: 800 MHz Radios have to be encoded to access OCC approved repeater sites. Motorola is the only manufacturer who meets requirements for encryption. Acknowledged. Policy Revised: "Ambulance providers shall ensure that 800 MHz CCCS radios are available on OCEMS approved 9-1-1 transport units and that all personnel are trained on the proper use of the radios."
12-16-13	Matt Armstrong	MedCoast Ambulance Service	<u>II. B.</u> Need to delete section. What does "on" mean exactly?	Acknowledge. Policy Revised: <i>"The UHF MED 9 Radio shall be "on" and programed to the MED 9 channel at all times and the microphone attached while the ambulance is in operation"</i>

			<u>IV. C.</u> How can the agency measure this standard? <u>IV. B. 1.</u> Delete section, Contradicts procedures	See previous response provided for same/similar comment. See previous response provided for same/similar comment.
12-17-13	Robert Vierra	Care Ambulance Service, Inc	<u>II.B.</u> - Please delete. What is the purpose having the MED 9 on? Doing so requires a separate radio for some providers that will add significant cost to ambulance providers. As stated in II.D the MED 9 is not for day-to-day dispatch operations but for MCI, disaster, or emergency use only. (Roman Numeral IV is duplicated in the draft) <u>I.V.</u> - UHF MED-9 Communication Equipment Testing Requirement: C. - Please delete. What is the method for measuring compliance? Current methods are not accurate and reliable. The current practice of testing only allows a 4 hour window for multiple providers with hundreds of ambulances to verbally communicate back to back without any interruption. When calculated (240 minutes divided by the number of ambulances), it is not practical when there is only tens of seconds per ambulance to communicate. Some of the ambulance are in service and may be transporting during the testing process. The process is also dependent on accurate manual documentation. I.V. UHF Med-9 Communications Equipment Testing	See previous response provided for same/similar comment. See previous response provided for same/similar comment.

			Procedure: B. Radio Codes - Please Delete. This policy contradicts policies and/or practices of the Orange County Fire Authority, Metro Cities Fire Authority, Costa Mesa Fire, Department of Homeland Security (DHS), and many other public agencies. DHS has made a push for all agencies to switch from 10 codes to plain language and the National Emergency Communications Plan distributed in July of 2008 calls for the use of plain language. Additionally this policy contradicts current OC EMS policy 720.00, Section 302, I.V., 6. (Last Sentence)"Each fire department may, at their option, provide additional specific operational radio procedures to the ambulance provider." <u>I.V. C. Ambulance Providers 2.</u> - Please delete. A list of ambulances is provided to the agency on an annual basis and ongoing as ambulances are decommissioned and placed into service. Please delete any 10 code references. Refer to previous comments in this section regarding the use of 10 codes vs. plain language. <u>I.V. C Ambulance Providers 3.</u> - Please delete. The current practice of testing only allows a 4 hour window for multiple providers with hundreds of ambulances to verbally	See previous response provided for same/similar comment. Acknowledged. Policy Revised: <i>"Each ambulance provider will supply Orange County EMS with a list of current ambulance unit numbers 72 hours prior to each test."</i> See previous response provided for same/similar comment. See previous response provided for same/similar comment.
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			communicate back to back without any interruption. When calculated (240 minutes divided by the number of ambulances), it is not practical when there is only tens of seconds per ambulance to communicate. Some of the ambulance are in service and may be transporting during the testing process. The process is also dependent on accurate manual documentation. <u>V. H. 1. Radio Operational Procedures</u> and 2. Typical Radio Transmissions - Please delete. This policy contradicts current OC EMS policy 720.00, Section 302, I.V., 6. (Last Sentence)"Each fire department may, at their option, provide additional specific operational radio procedures to the ambulance provider." This policy also contradicts current policy and/or practices of the Orange County Fire Authority, Metro Cities Fire Authority, and Costa Mesa Fire. Ambulance communication with each fire department should be left to the ambulance provider and the contracted partner.	See previous response provided for same/similar comment.
12-17-13		Lynch EMS	We object to requiring the radio in the ambulance to be on the "on" position with Med-9 channel. We propose that the organization shall have the Med-9 channel on at all times, but the in unit radio may be utilized for company specific radio frequencies and turned to Med-9 when	See previous response provided for same/similar comment.

			instructed to do so by the County or by the service dispatch	
12-17-13	Suzanne Goodrich	Orange City Fire	<u>General Comment</u> Based on past history, OFD believes that the various sections of Policy 720.00 out for public comment continue to apply only to private ambulance providers. If that is not correct, it is a change that needs to be stated clearly, not left for the reader to infer. New language in section 300 “<i>(optional for ambulances operated by a public agency)</i>” appears to indicate that the intent is that these policies do apply to public agencies except where specifically noted.	See previous response provided for same/similar comment.
12-17-13 	Suzanne Goodrich	Orange City Fire	<u>Page 3; C.3</u> <u>The MED-109 radio tests will be initiated by the ambulance provider units anytime within the 244-hour period on the date specified on the schedule.</u> What/ When is the 4-hour period? Who determines when that 4-hour period will be? We don’t see a reference to this 4-hour period anywhere else in the document	Acknowledged- OCEMS Comment: Section describes MED-9 radio test conducted by OCEMS. Schedule provided by OCEMS for MED-9 radio test dates and times.

OCEMS Policy #720.00 Section 306 Ground Ambulance Provider Inspection

Date	Contact	Organization	Comment	OCEMS Response
12-10-13	Bill Weston	AAOC	<u>Section III. B 2</u> - Conflicts with existing CA Labor Code Regulations that requires us to protect employee personnel records. Please delete. <u>Section V. A4 and B4</u> - Please specify what type of criminal conviction needs to be disclosed. For example, would a arrest for minor in possession of alcohol or speeding over 100 mph be required to be disclosed?	Acknowledged. Policy Revised- Deleted: “Personnel Records” Acknowledged- OCEMS Comments: Any criminal conviction may be taken into consideration
12-17-13	Jimmy McNeal	Schaefer Ambulance Service, Inc.	attached is a word file with comments for 720.302, 304, 306 43.10 and xxx.xx	See next line(s) for submitted comment.
12-17-13	Jimmy McNeal	Schaefer Ambulance Service, Inc.	720.00 Section 306 <u>Section V Subsection A 4.</u> This section should make reference to individuals who are working for or have an interest in the business or are married to the principal of the company. Just because an owner/principal has a brother/sister and that individual has been convicted of a crime shouldn't affect the process. As it is currently stated we felt there might be a constitutional violation “Guilt by Association”. <u>Subsection B 4.</u> Our comments are the same as stated in subsection A 4.	See previous response provided for same/similar comment. See previous response provided for same/similar comment.

12-17-13	Robert Viera	Care Ambulance Service, Inc	<u>III. B.</u> - Please delete "Personnel Records" or modify to be specific. Ambulance providers have an obligation to protect their employee's information. It is acceptable to demonstrate an employee has the required certifications to be employed as an Emergency Medical Technician but other information may not be appropriate to share without a specific incident that initiated an investigation. <u>V.A 4 & B.4.</u> - Define what type of convictions. Overly broad.	See previous response provided for same/similar comment. See previous response provided for same/similar comment.
12-17-13		Lynch EMS	No Comment	Acknowledged.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>General Comment</u> Based on past history, OFD believes that the various sections of Policy 720.00 out for public comment continue to apply only to private ambulance providers. If that is not correct, it is a change that needs to be stated clearly, not left for the reader to infer. New language in section 300 "<i>(optional for ambulances operated by a public agency)</i>" appears to indicate that the intent is that these policies do apply to public agencies except where specifically noted.	See previous response provided for same/similar comment.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 1; III.B.3.</u> <u>3. Dispatcher personnelBilling records.</u> What type of billing records?	Acknowledged- OCEMS Comments: OCEMS often receives complaints from patients that they have been overbilled. OCEMS investigate complaints received.

12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 1, III.B.6.</u> <u>6. Patient Care Reports</u> How many patient care records? Why is this necessary if the provider is using ePCR's and participating in OC-Meds? Couldn't OCEMS review what they need to review through Service Bridge?	Acknowledged- OCEMS Comments: No quantity specified. Inspection may include random audit of completed prehospital care reports posted to OC-MEDS.
12-17-13	Cathy Ord	Newport Beach Fire Department	<u>General Comment</u> Based on past practice, NBFD believes that the 720.00 series policies out for public comment do not apply to public agencies. If the practice has changed, that needs to be stated clearly. New language in section 300 "optional for ambulances operated by a public agency" appears to indicate that the intent is that these policies do apply to public agencies except where specifically noted. Please clarify.	See previous response provided for same/similar comment.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 1; III.B.3.</u> <u>3. Billing records.</u> Needs further clarification on why billing records must be reviewed during ambulance inspections.	See previous response provided for same/similar comment.

OCEMS Policy #720.00 Section 308 Ground Ambulance Vehicle Inspection

Date	Contact	Organization	Comment	OCEMS Response
12-10-13	Bill Weston	AAOC	No Comments	Acknowledged.
12-17-13		Lynch EMS	No Comment	Acknowledged.
12-17-13	Suzanne Goodrich	Orange City Fire	No Comment	Acknowledged.

OCEMS Policy #720.00 Section 310 Required Shift Ground Ambulance Self-Inspection

Date	Contact	Organization	Comment	OCEMS Response
12-10-13	Bill Weston	AAOC	<u>Section I. A thru E</u> - As more forms become electronic, there is no need for a supervisor's name on every completed form. Lets take advantage of our E tracking capabilities and work towards a better solution.	Acknowledged- OCEMS Comments: Policy will be revised and presented for public comment.
12-17-2013	Robert Viera	Care Ambulance Services, Inc	<u>I. E.</u> - Please delete. <u>In I. C.</u> the option to submit the checkout sheet to a supervisor OR as company policy dictates for follow-through, is given. Company policy may require an employee to submit electronically a checkout sheet and the option of noting a supervisor may not be available. Having a process in place as outlined in company policy to address a checkout sheet and/or malfunctions should meet this requirement. <u>II.</u> Delete. It is the company's responsibility. to take appropriate action. Company policy	Acknowledged- OCEMS Comments: Policy will be revised and presented for public comment.

			may hold a supervisor responsible and electronic reporting may hold someone other than a supervisor responsible.	
12-17-13		Lynch EMS	No Comment	Acknowledged.
12-17-13	Suzanne Goodrich	Orange City Fire	No Comment	Acknowledged.

OCEMS Policy #720.00 Section 402 Ground Ambulance License

Date	Contact	Organization	Comment	OCEMS Response
12-10-13	Bill Weston	AAOC	No Comments	Acknowledged.
12-17-13		Lynch EMS	No Comment	Acknowledged.
12-17-13	Suzanne Goodrich	Orange City Fire	No Comment	Acknowledged.

OCEMS Policy #720.00 Section 500 Ground Ambulance: Patient Care Report

Date	Contact	Organization	Comment	OCEMS Response
12-10-13	Bill Weston	AAOC	<u>Section II. A and B</u> - Suggest changing "in real time or near real time" and "immediate" to "in a timely manner". There are circumstances that sometimes delay the transmission of a completed EPCR report, for example calls for service holding.	Acknowledged. Policy section revised to: <i>"Documentation shall be completed per policy 300.10 - OC-MEDS Documentation Standards".</i>
12-16-2013	Matt Armstrong	MedCoast Ambulance Service	<u>Section II. A.</u> Remove "immediate" replace with "timely manner"	See previous response provided for same/similar comment.
12-17-13	Robert Viera	Care Ambulance Service, Inc	<u>II. B. & III. B.</u> - Recommend to change "made immediately available" to "in a timely manner". Current technology used by many	See previous response provided for same/similar comment.

			agencies does not allow for an immediate electronic copy to be available. "in a timely manner" allows some reasonable flexibility should technical problems arise.	
12-17-13		Lynch EMS	<u>Section III, B</u> - Request that "receiving facility" be specified as a ERC or facility with OCMEDS capabilities.	Acknowledged. Policy section revised to: <i>"Documentation shall be completed per policy 300.10 - OC-MEDS Documentation Standards".</i> and <i>"Receiving facilities without OC-MEDS access shall be provided with a verbal report and a company contact from which the receiving personnel can request a copy of the PCR"</i>
12-17-13	Suzanne Goodrich	Orange City Fire	No Comment	Acknowledged.

OCEMS Policy #720.00 Section 504 Ground Ambulance: Personnel Files

Date	Contact	Organization	Comment	OCEMS Response
12-10-13	Bill Weston	AAOC	No Comments	Acknowledge.
12-17-13	Robert Viera	Care Ambulance Service, Inc.	<u>I. A. 4.</u> - Please delete. It may not be appropriate to share disciplinary records unless it is related to a specific incident being investigated. An ambulance provider has an obligation to protect its employee's information and files.	See previous response provided for same/similar comment.
12-17-13		Lynch EMS	No Comment	Acknowledge.
12-17-13	Suzanne Goodrich	Orange City Fire	No Comment	Acknowledge.

OCEMS Policy #720.00 Section 506 Ground Ambulance: Ambulance Files

Date	Contact	Organization	Comment	OCEMS Response
12-10-13	Bill Weston	AAOC	<u>Section III. A</u> - Please delete entire section. Conflicts with Section 310. <u>Section III. D</u> - Why would the OC EMS Agency needs a providers vehicle purchasing or lease agreement?	Acknowledged. Policy section revised to: <i>"Each ambulance file shall contain:</i> A. <i>Shift checkout sheet."</i> Delete numbers 1-5 under section A "shift checkout sheet" Policy will be revised and presented for public comment. Acknowledged. Policy revised - deleted: <i>"purchasing/leading and"</i>
12-16-13	Matt Armstrong	MedCoast Ambulance Service	<u>Section III. D.</u> Purchase/Leasing? For what purpose?	See previous response provided for same/similar comment.
12-17-13	Robert Viera	Care Ambulance Service, Inc.	<u>Delete policy 720.00 Section 506.</u> It is redundant with other policies such as 720.00 Section 310. III. A. 5. - Please delete. With the advent of electronic documentation there are other processes in place to report a checkout sheet and malfunctions. A company policy outlining that process may suffice that could include others that are not supervisors responsible to taking action. <u>III. D.</u> - Please delete. Purchase or Leasing information may be proprietary. <u>III. E.</u> - Please delete. California Highway Patrol already requires it.	See previous response provided for same/similar comment. See previous response provided for same/similar comment. Acknowledged- OCEMS Comment: Section is specific to documentation as evidence of compliance with requirements of ambulance license.

12-17-13		Lynch EMS	No Comment	Acknowledge.
12-17-13	Suzanne Goodrich	Orange City Fire	No Comment	Acknowledge.

OCEMS Policy #750.05 Air Ambulance and Air Rescue Services Data Reporting

Date	Contact	Organization	Comment	OCEMS Response
12-10-13	Bill Weston	AAOC	No Comments	Acknowledge.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 1; III.</u> <u>EMS Aircraft Providers will comply with OCEMS requirements for uniformed electronic record keeping, data collection and electronic submission of all Orange County EMS data system elements to OCEMS and OC-MEDS.</u> Is there a deadline for compliance?	Acknowledged- OCEMS Comment: Electronic record keeping, data collection and electronic submission as described in this section must be achieved by January 1, 2015.

OCEMS Policy #720.00 Section 508 Ground Ambulance: Licensing Fees

Date	Contact	Organization	Comment	OCEMS Response
12-10-13	Bill Weston	AAOC	No Comment	Acknowledge.
12-17-13		Lynch EMS	No Comment	Acknowledge.
12-17-13	Suzanne Goodrich	Orange City Fire	No Comment	Acknowledge.

OCEMS Policy #xxx.xx Mass Gathering

Date	Contact	Organization	Comment	OCEMS Response
11-4-13	Roy Englebrecht	Roy Englebrecht Promotions	I am in full support of this new policy being approved. In some cities I am required to pay twice what I pay in other cities for paramedic service, plus also have the cost of an ambulance. I would like to have the option to hire whom ever I wanted in Orange County as long as they met the California State Athletic Commission requirements. Thanks, Roy Englebrecht	Acknowledged.
12-10-13	Bill Weston	AAOC	No Comment	Acknowledged.
12-17-13	Jimmy McNeal	Schaefer Ambulance Service, Inc.	attached is a word file with comments for 720.302, 304, 306 43.10 and xxx.xx	See next line(s) for submitted comment.
			XXX.XX Mass Gathering Events It would be nice if OCEMS would consider private paramedic ambulances to be able to provide this service and have the ability to transport a patient. Provided the event has adequate resources for the venue.	Acknowledged- OCEMS Comment: For areas that are exclusive operating areas, the contracted 9-1-1 ambulance is the only company permitted to do transport after patient stabilization at the scene; for non-exclusive operating areas, the city may allow the use of OCEMS approved ALS providers.
12-17-13	Robert Viera	Care Ambulance Service, Inc.	III. E. - Does etc... at the end of the paragraph include ambulance? If so could it be added? If not could that be made clear to exclude ambulance?	Acknowledged- OCEMS Comments: Policy will be revised and presented for public comment.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 2; II.</u> <u>Responsibility of Jurisdictional Provider Agency</u>	Acknowledged- OCEMS Comments: Policy will be revised and presented for public comment.

			What if the Jurisdictional Provider Agency isn't even aware of the event taking place? Who is responsible for making sure the event hires personnel who are accredited in O.C., A patient care log is completed, a briefing is conducted on gaining access in a crowd, possible barriers and potential exit points (medical plan briefing), etc.? This regulation is putting a lot of responsibility on the agency with jurisdiction – responsibilities that will require significant staff time to carry out properly. Many jurisdictions do not have staffing sufficient to comply with all the components in this policy, even though we agree they are well intended and most likely driven by problems at previous events throughout O.C. Other than showing up to do a spot inspection during an event, how would we know whether or not some of these issues requirements were being followed properly?	
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 2; II. B</u> <u>B. The jurisdictional provider agency will determine the transporting company. Event medical staff must remain at the event to provide care.</u> We support this requirement.	Acknowledged.
12-17-13	Suzanne	Orange City Fire	<u>Page 2; II. C.</u>	Acknowledged- OCEMS Comments:

	Goodrich		<u>Ensure staff are familiar with OCEMS MCI policies and procedures. (Ref. OCEMS policy 900.00)</u> Who's staff, the event staff or the Agency with Jurisdiction? How is the Agency with Jurisdiction supposed to determine that staff who show up to work the event are familiar?	Policy will be revised and presented for public comment.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 2; III. A.</u> <u>A. On site medical personnel must be minimally certified as an accredited Orange County EMT and equipped to provide the complete EMT Scope of practice as defined in California Code of Regulations, Title 22, Section 100163. They shall follow Orange County EMS Agency Policies and Protocols. (Ref. 315.00 Scope of Practice: EMT-OCEMS Accredited)</u> We support this requirement.	Acknowledged.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 2; III B.</u> <u>B. Maintain a patient care log which includes patient information, chief complaint, treatment, disposition (and diagnosis if contracted physician is on site). (Ref. 390.15 Prehospital care report)</u> Who is responsible for keeping this log when the event is over? How long do they have to keep it?	Acknowledged- OCEMS Comments: Policy will be revised and presented for public comment.

12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 2; III. D.</u> <u>D. Paramedics shall be licensed by the State of California and EMTs must be accredited by Orange County. (Open to audit by OCEMS).</u> We support this requirement.	Acknowledged.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 3; G.</u> <u>G. Medical personnel must consider the potential patient and environment; ages of people attending, duration of event, hot or cold weather, crowd seated or standing, social ideas, type of potential medical problems.</u> Please elaborate or explain what OC EMS means by the term social ideas.	Acknowledged- OCEMS Comments: Policy will be revised and presented for public comment.
12-17-13	Suzanne Goodrich	Orange City Fire	<u>Page 3; H.</u> <u>H. A requirement for an event supervisor is a local emergency medical personal EMT/Paramedic that has knowledge of Orange County scope of practice.</u> We support this requirement.	Acknowledged.
12-17-13	Cathy Ord	Newport Beach Fire Department	<u>Page 2; II</u> <u>Responsibility of Jurisdictional Provider Agency</u> What if the Jurisdictional Provider Agency isn't even aware of the event taking place?	Acknowledged- OCEMS Comments: Policy will be revised and presented for public comment.

			Who is responsible for making sure the event hires personnel who are accredited in O.C., A patient care log is completed, a briefing is conducted on gaining access in a crowd, possible barriers and potential exit points (medical plan briefing), etc.? This regulation is putting a lot of responsibility on the agency with jurisdiction – responsibilities that will require significant staff time to carry out properly. Many jurisdictions do not have staffing sufficient to comply with all the components in this policy, even though we agree they are well intended and most likely driven by problems at previous events throughout O.C. Other than showing up to do a spot inspection during an event, how would we know whether or not some of these issues requirements were being followed properly?	
12-17-13	Cathy Ord	Newport Beach Fire Department	<u>Page 2; II. B.</u> <u>B. The jurisdictional provider agency will determine the transporting company. Event medical staff must remain at the event to provide care.</u> We support this requirement	Acknowledged.
12-17-13	Cathy Ord	Newport Beach Fire Department	<u>Page 2; II. C.</u> <u>Ensure staff are familiar with OCEMS MCI policies and procedures. (Ref. OCEMS policy 900.00)</u>	Acknowledged- OCEMS Comments: Policy will be revised and presented for public comment.

			Who's staff, the event staff or the Agency with Jurisdiction? How is the Agency with Jurisdiction supposed to determine that staff who show up to work the event are familiar?	
12-17-13	Cathy Ord	Newport Beach Fire Department	<u>Page 2; III. A.</u> <u>A. On site medical personal must be minimally certified as an accredited Orange County EMT and equipped to provide the complete EMT Scope of practice as defined in California Code of Regulations, Title 22, Section 100163. They shall follow Orange County EMS Agency Policies and Protocols. (Ref. 315.00 Scope of Practice: EMT-OCEMS Accredited)</u> We support this requirement	Acknowledged.
12-17-13	Cathy Ord	Newport Beach Fire Department	<u>Page 2; III. B.</u> <u>B. Maintain a patient care log which includes patient information, chief complaint, treatment, disposition (and diagnosis if contracted physician is on site). (Ref. 390.15 Prehospital care report)</u> Who is responsible for keeping this log when the event is over? How long do they have to keep it?	Acknowledged- OCEMS Comments: Policy will be revised and presented for public comment.
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			<u>OCEMS).</u> We support this requirement.	
12-17-13	Cathy Ord	Newport Beach Fire Department	<u>Page 3; G.</u> <u>G. Medical personnel must consider the potential patient and environment; ages of people attending, duration of event, hot or cold weather, crowd seated or standing, social ideas, type of potential medical problems.</u> Please elaborate or explain what OC EMS means by the term social ideas	Acknowledged- OCEMS Comments: Policy will be revised and presented for public comment.
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