

**SPECIALIZED MEDICAL SERVICES
EMERGENCY MEDICAL SERVICES**

DATE: March 30, 2026

TO: EMS Distribution – ALL

FROM: Almaas A. Shaikh, MD, MPH, FACS
Interim EMS Medical Director
Deputy Health Officer



**SUBJECT: 50-DAY COMMENT PERIOD FOR UPDATES TO INTERFACILITY TRANSPORT
ADVANCED LIFE SUPPORT (IFT-ALS) SERVICE PROVIDER CRITERIA POLICY #777.00**

This memo announces the opening of a 50-day public comment period for the updated *Interfacility Transport Advanced Life Support Service Provider Criteria* (OCEMS Policy #777.00).

OCEMS has made substantive revisions to the policy, and a redlined version highlighting all changes is attached for review. The comment period will open on **March 31, 2026 at 8:00 a.m.** and will close on **May 20, 2026 at 8:00 a.m.** Comments may be submitted online using the link or QR code provided below.

Comment Form Link: https://ochca.sjc1.qualtrics.com/jfe/form/SV_2fcl5BG1Gz6aFy6





INTERFACILITY TRANSPORT ADVANCED LIFE SUPPORT (IFT-ALS) SERVICE PROVIDER CRITERIA

I. AUTHORITY:

California Health and Safety Code, Division 2.5 -1797.218. California Health and Safety Code, Division 2.5 – 1791.200, 1797.206, 1797.208, and 1797.214. California Title 22, Section 100090.03144; (b):

II. APPLICATION:

- A. This policy defines the criteria for designation of an Interfacility Transport Advanced Life Support (IFT- ALS) service provider by Orange County Emergency Medical Services (OCEMS). Designation as an OCEMS IFT-ALS service provider is in addition to an OCEMS basic ambulance license.
- B. IFT-ALS service providers are authorized to perform advanced life support (ALS) transports that are requested by medical order of a California licensed physician or licensed medical provider representing a California authorized healthcare provider organization or agency. Appropriate transports are those that can be conducted within the scope of practice of California licensed and OCEMS Accredited IFT-ALS personnel (See OCEMS Policy #310.20).
- C. It is the prospective applicant's responsibility to review this policy and the IFT-ALS Service Provider Designation application to assess if their organization satisfies the requirements necessary for IFT-ALS designation.
- D. A prospective IFT-ALS service provider shall submit ~~an electronic a~~ application that addresses each element of Section III, which include:
1. An electronic application submission to: www.oc-meds.org/lms/public/.
 2. An inspection for compliance of all application components:
 - a. Ambulance vehicle and equipment inspection
 - b. ePCR /PCRS documentation system
 - c. Ambulance Operations
 - d. IFT-ALS Continuous Quality Improvement (CQI) plan
 - e. All other components articulated in OCEMS policies

III. CRITERIA:

- A. Orange County licensed ambulance service providers intending to apply for IFT-ALS transport designation must meet the following requirements before applying:
1. Licensed by OCEMS as a BLS Ground Ambulance Provider for at least two years.
 2. Have successfully transmitted a minimum of 500 ePCRs, compliant with OC-MEDS/CEMSIS/NEMSIS PCRS data, for the proceeding 365 days licensed with OCEMS.
 3. Have one year of BLS transport CQI data.
- A.B. An IFT- ALS service provider shall continuously maintain an unrestricted ambulance license issued by Orange County EMS.
- B.C. An IFT-ALS service provider shall identify the number of IFT-ALS units in service and provide a statement of geographic coverage for Orange County.
- C.D. An IFT-ALS service provider must comply with OCEMS requirements for uniform electronic record keeping, data collection and electronic submission of all Orange County EMS data system elements to the OCEMS OC-MEDS data system.



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D.E. An IFT-ALS service provider must use OCEMS Policy #310.20 based dispatch protocols approved by OCEMS that determine the appropriate level for dispatch of incoming calls, including: BLS level, ALS level, SCT (Registered Nurse staffed) level, and referral to the 911 System for emergency medical aid (Also Refer to OCEMS P/P 310.20 Attachment A).

E.F. The IFT-ALS service provider application shall include:

1. Proof of Orange County Ground Ambulance Licensure for a minimum of one year. Documentation of licensure as an Orange County ambulance provider that is compliant with OC MEDS (OCEMS county-wide data system).
2. Proof of a minimum of 500 successfully transmitted ePCRs, compliant with OC-MEDS/CEMESIS/NEMSIS PCRS data, for the proceeding 365 days.
3. Agreement to respond to an unscheduled IFT-ALS level transport call within a maximum of 30 (thirty) minutes from the initial contact of the provider dispatch center.
4. A response plan that demonstrates how the IFT-ALS applicant will cover the geographic service area provided in Section III, C.
- ~~2.5.~~ Agreement to provide transport services to any patient, regardless of payor status, in need of IFT-ALS transport for which the requirements of the transport are within the scope of practice of IFT-ALS paramedics. Agreement to respond within the stated geographic service area (Section III, B) and transport any patient (regardless of payer status) in need of ALS transport for which the requirements of the transport are within the scope of practice of IFT-ALS.
- ~~3.6.~~ Agreement to provide service response on an uninterrupted daily, continuous 24-hour/24-hour basis.
- ~~4.~~ Agreement to respond for an unscheduled IFT-ALS level transport call within a maximum 30 (thirty) minutes of the initial contact of the provider dispatch center.
- ~~5.7.~~ Agreement to adhere to applicable sections of the California Health and Safety Code, California Title 22 and to OCEMS policies, standing orders, and procedures.
- ~~6.8.~~ Minimum staffing of an IFT-ALS ambulance is one OCEMS Accredited IFT-ALS paramedic and one OCEMS Accredited EMT. It is preferred that an IFT-ALS paramedic new to Orange County have three months field experience with an OCEMS Accredited IFT-ALS paramedic before staffing on a 1 paramedic:1 EMT basis.
- ~~7.9.~~ A list of all licensed and locally accredited IFT-ALS personnel sponsored by the IFT-ALS service provider.
- ~~8.~~ 10. The full IFT-ALS medication and equipment inventory must be stocked on each IFT-ALS unit as described in OCEMS Policy # 325.00, subject to inspection at any time.
11. An identified, qualified IFT-ALS program coordinator who is a California licensed Registered Nurse with a minimum of three (3) years experience in emergency or critical care nursing or advanced life support transport that will be the liaison with OCEMS and conduct mandatory OCEMS system updates and ongoing training of IFT-ALS staff of the provider.



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- a. The IFT-ALS Coordinator will be familiar with OCEMS policies, standing orders, and procedures and perform or oversee the following tasks:
 - 1) ~~Orient IFT-ALS personnel to the OCEMS IFT-ALS program. Ensure orientation of personnel to OC paramedic scope of practice and the IFT-ALS program.~~
 - 2) ~~a) Maintain documentation of IFT-ALS personnel orientation to the OCEMS IFT-ALS program.~~
 - 3) ~~2) Develop and maintain an OCEMS approved IFT-ALS CQI quality assurance plan as set forth by OCEMS policy and procedures. A copy of the provider IFT-ALS CQI quality assurance plan must accompany the application and the appropriate current plan with an annual report of CQI quality assurance activities shall be submitted yearly to OCEMS.~~
 - 4) ~~3) Assure that IFT-ALS personnel adhere to BLS and ALS Standing Orders approved by the OCEMS Medical Director.~~
 - 5) ~~4) Assure that IFT-ALS personnel adhere to patient care report documentation standards.~~
 - 6) ~~5) Ensure the ongoing education and competency of all IFT-ALS personnel.~~

12. IFT-ALS service provider policies for:

- a. ~~Notification to of OCEMS of IFT-ALS service provider operational modifications is required. including:~~
 - 1) ~~Notification for planned modifications shall be made at least six (6) weeks prior.~~
 - 2) ~~Notification for unplanned modifications shall be made within 24 hours.~~
 - a-3) ~~Examples include: Number of units or unit locations, geographic area coverage, coordinator changes, office site changes, status of clinical personnel.~~
 - 1) ~~Proposed changes in number of units or unit locations.~~
 - 2) ~~Proposed changes in geographic area coverage for IFT-ALS services.~~
 - 3) ~~IFT-ALS Coordinator changes and office site changes.~~
 - 4) ~~Changes in status of IFT-ALS OCEMS licensed and accredited personnel.~~
- b. Mechanism to receive, respond to, and notify OCEMS (with specific complaint or circumstances within 24 hours) of the following occurrences:
 - 1) All patient complaints (excluding billing) involving an IFT-ALS transport.
 - 2) Hospital complaints regarding IFT-ALS transports.
 - 3) Violations of OCEMS policies or standing orders.
- c. To work in conjunction with OCEMS when evaluating IFT-ALS medical and communication equipment.
- d. ~~Provide field internship opportunities for paramedic trainees from OCEMS approved paramedic training programs.~~
- e.d. Ensuring all OCEMS accredited IFT-ALS personnel attend and successfully pass exams to show competence in OCEMS mandatory updates for EMS personnel. To ensure all IFT-ALS



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personnel are updated when revisions to ALS Standing Orders are made by the OCEMS Medical Director.

- f.e. Maintenance and training of IFT-ALS personnel for appropriate communication equipment to allow for contact of the Orange County Communications radio system.
- g.f. The timely reporting of infectious disease exposures to other health care providers and facilities possibly exposed and methods for timely medical care and prophylaxis (as appropriate) for service provider IFT-ALS and other service provider personnel.
- h.g. Addressing the approved method for handling, transporting, storing, and disposing of biomedical waste.
- i.h. Regular inspection for and resupply of used or expired medications and equipment.
- j.i. Ensuring and maintaining documentation (when not ~~medically~~ contraindicated for an Individual) of annual influenza vaccination and tuberculosis testing for IFT-ALS staff who are in direct patient contact.

IV. DESIGNATION:

A. Upon initial application for designation as an IFT-ALS Service provider:

1. An IFT-ALS service provider designation is valid from the date of issue until December 31 of the same calendar year.
2. An IFT-ALS service provider designation is ~~nontransferable~~non-transferable.

B. Upon application for annual renewal of designation:

1. Designation renewals shall be made in the same manner as an initial application.

V. NONCOMPLIANCE:

A. Initial Designation Application Inspection to include application review, service operations, and all vehicles to be licensed:

1. 1.—An IFT- ALS service provider designation will not be issued to an applicant requesting this designation until all items of non-compliance identified by OCEMS are corrected and re-inspected by OCEMS.
2. Any application, paid or unpaid, that is inactive for more than 30 days shall be deemed inactive and terminated without refund.
3. 2.—If an ambulance provider applicant cannot correct items of non-compliance identified by OCEMS in the IFT-ALS application -within 390 days of ~~notification~~a second company inspection, their application will be deemed inactive and terminated, without refund. Ambulance provider will not be eligible for reapplication after 180 days.denied and ineligible for reconsideration for 365 days.
 - a. Applicant will receive notification from OCEMS informing them of their areas of non-compliance and the date of the last day of the 90-day correction period.
4. If there is evidence of intent to mislead OCEMS~~the agency~~ in the initial application, the application will be ~~denied~~denied, and the ambulance provider will be ineligible for reconsideration for 730 days.



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5. Application Designation fees are non-refundable.

B. Annual Designation Renewal Inspection to include application review, service operations, and all vehicles to be licensed:

Renewal of an IFT- ALS service provider designation will not be issued to an ambulance service provider until all items of non-compliance identified by OCEMS during annual inspection are corrected and re-inspected by OCEMS.

1. If an ambulance provider applicant cannot correct items of non-compliance within 30 days of a second company inspection, their application will be denied and ineligible for reconsideration for 365 days.
2. If there is evidence of intent to mislead the agency in the application, the application will be denied and ineligible for reconsideration for 730 days.
3. Designation fees are non-refundable.

C. Other Inspections:

For an inspection of an ambulance service not related to an initial or renewal inspection for IFT- ALS service provider designation, the following shall apply when items of non-compliance are identified by the OCEMS:

1. At the time of inspection, OCEMS shall indicate in writing to the licensee/designee specific items of non-compliance, time frame for correction and date of re-inspection. It is the responsibility of the ambulance service operator to arrange for re-inspection within required time frame.
2. If items of non-compliance are not corrected and re-inspected by OCEMS within the time frame designed by OCEMS, a complaint may be filed by OCEMS staff or OCEMS staff may recommend to the OCEMS Medical Director that the ambulance service license and/or IFT- ALS service provider designation be suspended or revoked.

D. It is the responsibility of the IFT-ALS Service Provider to arrange for any required re-inspection within the required time frame.

VI. HEARING / SUSPENSION / REVOCATION:

- A. OCEMS may deny, suspend, or revoke the approval of an IFT-ALS service provider for failure to comply with state and county statutes, regulations, and ordinances or applicable OCEMS policies.
- B. A designated IFT-ALS provider that has been suspended or revoked may request a hearing as described by OCEMS Policy # 645.00, a copy of which may be viewed on the Orange County EMS Internet website.



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Approved:

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