



EMS Stakeholder Engagement Process

CVEMSA Position on Ambulance Service Authorizations

Current ordinance provides for the permitting of entities engaged in "...the business or service of the transportation of emergency medical patients in the County of Sonoma..."

California Code of Regulations includes specific requirements for the provision of Advanced Life Support, whether provided in an emergency setting or in the course of inter-facility transportation. Both personnel and provider agency requirements for authorization are addressed in CCR Title 22 Div. 9. Chapter 4 which regulates the provision of ALS. Services are required to operate in accordance with the Local EMS Agency medical control policies and to submit data to the LEMSA for the purposes of facilitating quality improvement.

Although the current Sonoma County Ordinance addresses Emergency and ALS services, the ordinance is silent on the regulation of non-emergency Basic Life Support (BLS) ambulance operations. Ambulances staffed by Emergency Medical Technicians routinely transport patients between hospitals, from hospitals to Skilled Nursing Facilities and in some cases from home to medical appointments if ambulance transportation is required. Because the current ordinance is silent regarding the BLS level of service, non-911 service providers are free to operate at the Basic Life Support (BLS) level within Sonoma County without the knowledge and oversight of the EMS Agency. This means the EMS Agency has no ability to impose standards, monitor policy compliance, inspect ambulance vehicles, capture patient care records or verify personnel. Non-permitted ambulance services may dispatch ambulances to calls for service in skilled nursing facilities, assisted living centers and private homes. Calls that are received on a seven-digit phone line may result in a BLS ambulance response without the safety of a call screening process to validate that the response is appropriate for a non-emergency ambulance. No call data is collected by the EMS Agency, and therefore patient care problems or performance issues are not visible to system quality managers.

The revised ordinance should require all private ambulance services operating within Sonoma County obtain an authorization from the EMS Agency to do so. The authorization should encompass the scope of the current ambulance permit process and include a requirement that any entity that dispatches ambulances so authorized obtain approval from the EMS Agency. The requirements of the authorization should include a current Paramedic Service Provider Agreement if the ambulance service operates at the ALS level. CVEMSA believes moving the requirements for authorization to an EMS agency process is needed to allow for changes in statute and regulation that occur from time to time.

Dispatch approval is included in the process to protect the public protecting public from inappropriate dispatch of privately dispatched ambulance services. The current Sonoma County 911 Fire EMS dispatch center, REDCOM (Redwood Empire Dispatch Communications Authority) utilizes an industry-standard call screening process that incorporates pre-arrival instructions to callers and integral quality management process to ensure call triage standards are followed by call-taking personnel. The call screening process can reliably determine if non-emergency ambulance transportation is appropriate in response to a call for service. The same process can identify circumstances requiring an emergent or ALS response. Such a process will be the EMS Agency standard for all ambulances dispatched within Sonoma County.

By ensuring that all ambulance operators providing services within Sonoma County are appropriately authorized to do so, including dispatch by a communications center utilizing an industry-standard call screening process, the EMS ordinance will support the delivery of high quality pre-hospital care by appropriately trained and credentialed responders.