

EMERGENCY MEDICAL SERVICES AUTHORITY

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August 12, 2014

Mr. Bryan Cleaver, Regional Administrator
Coastal Valleys EMS Agency
195 Concourse Boulevard, Suite B
Santa Rosa, CA 95403

Dear Mr. Cleaver:

This letter is in response to your 2012 Coastal Valleys' EMS Plan submission to the EMS Authority.

I. Introduction and Summary:

The EMS Authority has concluded its review of Coastal Valleys' 2012 EMS Plan and cannot approve this plan as submitted.

II. History and Background:

Coastal Valleys has inconsistently submitted EMS Plans to the EMS Authority. Historically, we have received EMS Plan documentation from Coastal Valleys for its 1999, 2001, 2004, 2006, 2008, and 2011 plan submissions, and most current, its 2012 plan submission.

Coastal Valleys received its last Five-Year Plan approval for its 2011 plan submission, and its last annual Plan Update approval for its 2006 plan submission. The California Health and Safety Code (H&SC) § 1797.254 states:

*"Local EMS agencies shall **annually** (emphasis added) submit an emergency medical services plan for the EMS area to the authority, according to EMS Systems, Standards, and Guidelines established by the authority".*

The EMS Authority is responsible for the review of EMS Plans and for making a determination on the approval or disapproval of the plan, based on compliance with statute and the standards and guidelines established by the EMS Authority consistent with H&SC § 1797.105(b). Due to the pattern of inconsistent EMS Plan submissions, an ongoing assessment of the EMS system in Coastal Valleys has been difficult and, therefore, has delayed this review.

Additionally, as a result of a change to Coastal Valleys' regional structure, Coastal Valleys' became ineligible to receive funding assistance beyond Fiscal Year 2010/11.

- The EMS Authority received electronic correspondence from Coastal Valleys on January 21, 2011, requesting transitional funding to help retain staff to support the workload associated with the EMS Plan, and other areas.
- In a letter to Coastal Valleys dated February 14, 2011, the EMS Authority recognized Coastal Valleys' funding concerns and the complexities surrounding the situation, but was unable to honor the request to provide further funding.
- Subsequently, the EMS Authority completed its review of Coastal Valleys' 2011 EMS Plan. In a letter to Coastal Valleys' dated September 28, 2011, the EMS Authority outlined minimum standards that were not met due to lack of funding, and Coastal Valleys was requested to provide documented progress in the next plan update for obtaining funding to meet these standards.

III. Analysis of EMS System Components:

Following are comments related to Coastal Valleys' 2012 EMS Plan. Areas that indicate the plan submitted is or is not concordant and consistent with applicable guidelines or regulations and H&SC § 1797.254 and the EMS system components identified in H&SC § 1797.103 are indicated below.

Several of the standards identified do not meet the established minimum standards, and/or lack the proper funding to maintain the standard.

A. System Organization and Management

1. System Assessment Forms

- Standard 1.01. The objective is to develop secure funding sources to adequately finance agency operations and personnel requirements.
- Standard 1.08. The needs and objectives are to ensure the optimal provision of ALS services by establishing provider agreements and funding.
- Standard 1.11. The needs are to identify funding for system development, monitoring, and Quality Improvement (QI).

- Standard 1.12. The needs and objectives are to identify funding to support the review and system monitoring; and to implement structural indicators and compliance mechanisms in conjunction with a regional QI program implementation.
- Standard 1.13. The need is to identify funding to support the coordination of EMS system operations.
- Standard 1.15. The need is to identify funding to support compliance with system policies.
- Standard 1.16. The objective is to seek long term sustainable funding to ensure the agency's viability.
- Standard 1.23. The need is to identify funding mechanisms to support development and monitoring of interfacility transfers.
- Standard 1.24. The objective is to maintain written agreements with all ALS providers. Pursuant to Title 22, California Code of Regulations (CCR) § 100168, an ALS provider shall have a written agreement with the Local EMS Agency to participate in the EMS system and to comply with all applicable State regulations and local policies and procedures.

B. Staffing/Training

1. System Assessment Forms

- Standard 2.02. The objective is to develop funding to resume approval and monitoring of EMS education programs.
- Standard 2.04. The needs and objectives are to develop funding to ensure all medical dispatchers maintain level II EMD training standards.
- Standard 2.05. The objective is to develop funding to allow for the oversight of first responder medical operations and continuous QI.
- Standard 2.06. The objective is to sustain funding for continuous oversight.

- Standard 2.07. The objective is to develop a funding source in order to verify compliance through the monitoring or enforcement of agency mandates. Begin reviewing electronic plan here.
- Standard 2.12. The objective is to develop a funding source to allow evaluation of existing policies and procedures for early defibrillation training and certification.

C. Communications

1. System Assessment Forms

- Standard 3.02. The need and objectives identify funding as a critical issue in the prioritization of system repairs and upgrades.
- Standard 3.04. The need is to establish funding from each county in order to perform an assessment of the communications system.
- Standard 3.05. The objective is to develop the communications plan, prioritize system repairs and upgrades, and make necessary changes as funding becomes available.
- Standard 3.06. The objective is to develop the communications plan, prioritize system repairs and upgrades, and make necessary changes consistent with system needs upon the establishment of system funding.
- Standard 3.07. The objective is to identify funding and staff to allow participation in ongoing planning and coordination of 9-1-1 telephone service and to encourage the development of secondary EMS PSAPs.
- Standard 3.08. The needs and objectives are to identify funding to allow for the coordination with other public safety agencies and primary health care organizations, and to provide for public education.
- Standard 3.10. The need is to maintain an integrated dispatch system in conjunction with the communications plan as funding allows.

2. Table 11 (Dispatch Agency)

- The number of personnel providing services is not identified on the Cal Fire Sonoma/Lake/Napa Unit ECC dispatch agency. In the next plan submission, please include the associated data.

D. Response/Transportation

1. System Assessment Forms

- Standard 4.02. The needs and objectives are to identify funding to allow for the monitoring of providers.
- Standard 4.05. The needs and objectives are to identify funding and staff to ensure the ability to measure response times from the primary PSAP to arrival on scene for ambulance and first response vehicles.
- Standard 4.06. The current status indicates that limited funding and staff impacts the ability to monitor compliance with the requirements.
- Standard 4.07. The need is to secure additional funding in order to incorporate industrial first aid teams into the system.
- Standard 4.17. The current status indicates that funding reductions have impacted the ability to inspect EMS units to verify compliance.
- Standard 4.18. The needs and objectives are to establish regional agreements with all providers; however, reduced funding has limited the ability to monitor compliance.

2. Ambulance Zones

- Based on the documentation you provided, please see the attachment on the EMS Authority's determination of the exclusivity of Coastal Valleys' EMS Agency's ambulance zones.

E. Facilities/Critical Care

1. Table 6 (Facilities/Critical Care)

- The data provided for referral emergency services, standby emergency services, basic emergency services, and receiving hospitals with written agreements is inconsistent with the information presented for the facilities in Table 9. In the next plan submission, please ensure the data contained in both tables is consistent.

F. Data Collection/System Evaluation

1. System Assessment Forms

- Standard 6.01. The needs and objectives are to identify funding to support the resources needed to evaluate the care provided to specific patients.
- Standard 6.03. The objective is to develop a data link to allow access to the EMS database system, ambulance provider agencies, and base hospitals to facilitate data collection and reporting, however, no funding source has been identified to fund these activities.
- Standard 6.04. The needs and objectives are to establish a funding source for the development of an oversight process to review medical dispatching.
- Standard 6.05. The needs and objectives are to develop funding for on-going region-wide monitoring and to enable the training of system participants to use established QI processes and indicators.
- Standard 6.06. The needs and objective are to develop a funding source to fully fund, maintain, and support the regional continuous QI committee and region-wide continuous QI activity.
- Standard 6.07. The objective is to develop a funding source to enable education and compliance monitoring beyond current contracted providers.

- Standard 6.08. The need is to develop a funding source to allow for the regional data analysis using established QI indicators and benchmarks.
- Standard 6.09. The objective is to develop funding to monitor and amend the QA/QI program.

2. Quality Improvement Program

- Pursuant to Title 22, CCR § 100404, a Local EMS Agency shall develop and implement a written QI Program, and annually provide the written Program to the Authority. In accordance with the EMS Authority's *EMS System Quality Improvement Program Model Guidelines (EMSA #166)*, please submit a written QI Program that includes use of the EMS Core Measures as listed in *EMSA #166*.

3. CEMSIS EMS Data

- Using information submitted by the Local EMS Agency, the EMS Authority shall assess each EMS area or the system's service area to determine the effectiveness of emergency medical services (H&SC § 1797.102) as it relates to data collection and evaluation (H&SC § 1797.103). To enable the EMS Authority to make this determination, information must be made available by submission of NEMSIS Version 2.2.1 data to CEMSIS and NEMSIS Version 3 data to CEMSIS in 2015.

G. Public Information and Education

1. System Assessment Forms

- Standard 7.01. The objective is to develop funding to support the development and presentation of education materials and programs.
- Standard 7.02. The objective is to develop funding to support the development and promotion of injury control education programs.
- Standard 7.03. The objective is to develop funding to develop and promote citizen disaster preparedness activities.

- Standard 7.04. The objective is to develop funding to support the first aid and CPR training program.

H. Disaster Medical Response

1. System Assessment Forms

- Standard 8.02. The current status indicates limited funding has a direct impact on the ability to complete the work associated with the response plans and procedures.
- Standard 8.03. The current status indicates that due to limited funding, the agency lacks the ability to directly monitor and enforce this standard.
- Standard 8.04. The current status indicates the lack of sufficient funds limits the ability to ensure training for all medical providers.
- Standard 8.10. The objective is to develop and adopt a master medical mutual aid agreement within and between member counties.
- Standard 8.12. The current status indicates limited funding impairs the ability to establish plans for casualty collection points.
- Standard 8.13. The current status indicates the lack of funding limits the ability to actively review training of individual responders.
- Standard 8.15. The need indicates funding from the member counties is needed to ensure an emergency system for inter-hospital communications is available.
- Standard 8.16. The current status indicates limited funding restricts the ability to ensure that all pre-hospital medical response agencies and acute-care hospitals have developed guidelines.

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IV. Conclusion:

Following the review of Coastal Valleys' 2012 EMS Plan, the EMS Authority has determined that a lack of funding still continues to be an issue, significantly impacting Coastal Valleys' capacity to meet numerous statutory requirements such as compliance mandates, system planning, oversight and monitoring, conducting training program approvals, and many other services.

Based on the information identified, Coastal Valleys may not implement areas of the 2012 EMS Plan that have not been approved. Pursuant to H&SC § 1797.105(b):

"After the applicable guidelines or regulations are established by the authority, a local EMS agency may implement a local plan...unless the authority determines that the plan does not effectively meet the needs of the persons served and is not consistent with the coordinating activities in the geographical area served, or that the plan is not concordant and consistent with applicable guidelines or regulations, or both the guidelines and regulations established by the authority."

V. Next Steps:

Please provide the EMS Authority with a plan to correct Coastal Valleys' funding issues in order to be able to perform the required mandated responsibilities associated with the operation of Coastal Valleys' EMS System. The written plan is due to the EMS Authority by October 12, 2014.

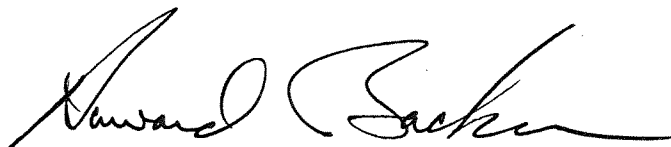
Within four (4) months from the date of this notification, Coastal Valleys has the option to submit a revised EMS plan correcting all disapproved items identified in this letter, or to appeal the EMS Authority's determination. Per H&SC § 1797.105(c):

"A local EMS agency may appeal a determination of the authority pursuant to subdivision (b) to the Commission."

Please let the EMS Authority know within the established timeframe if you wish to appeal the EMS Authority's disapproval of your EMS Plan.

Please contact Mr. Tom McGinnis, EMS Systems Division Chief, at (916) 431-3695 if you have any questions.

Sincerely,



Howard Backer, MD, MPH, FACEP
Director

Attachment