

**EMERGENCY MEDICAL SERVICES AUTHORITY**

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**DATE:** October 20, 2025

**TO:** Commission on EMS

**FROM:** Elizabeth Basnett, Director  
Dr. Hernando Garzon, Chief Medical Officer

**SUBJECT:** Exceedance of Ambulance Patient Offload (APOT) Standards – October 2025 Electronic Notification pursuant to Title 22, Division, 9, Chapter 1.2, § 100007.02.

**Background**

The Commission on EMS is receiving the following report to summarize all activities associated with the implementation of Assembly Bill 40 (Rodriguez, 2023-2024) related to Ambulance Patient Offload Times (APOT). EMSA has included the following background information to summarize the events and activities which demonstrate implementation of AB 40 requirements:

**APOT Audit Tool Portal – Enhancements**

- An update was deployed to the Audit tool portal allowing users to export their reports for ease of use and information sharing. This feature was implemented on October 10<sup>th</sup> 2025, and was one of the most requested features requested by our users.
- Additionally, EMSA added a field to recalculate adjusted offload times based on discrepancies identified by hospitals. To align with best practices associated with targeted audited, the “recalculated APOT” field will either appear green, indicating that the adjusted time would be below the LEMSA APOT standard, or red, indicated that the adjusted time will not impact their compliance with the local APOT standard.
- EMSA continues to improve the audit tool portal based on user feedback from hospital and LEMSA users. Enhancing usability and user experience remain a top priority to EMSA. EMSA staff continue to provide direct support to Audit Tool users.

**APOT Audit Tool Portal – Utilization Summary**

- To date, 141 hospitals have registered for the audit tool. EMSA is working with the California Hospital Association to increase registration.

**Hospital APOT Reduction Plan Compliance**

- EMSA staff continue to track and document all Hospital APOT Reduction Protocols.
- As of October 20, 2025, 127 hospitals have submitted their 2025 annual update.
- EMSA is engaging Local EMS Agencies and the California Hospital Association to increase compliance.
- EMSA expects between 220,000 records each month that meet the APOT criteria. In October 2025, roughly 175,000 records met APOT criteria, 79% of the total records expected. EMSA conducted targeted outreach to LEMSAs who's larger (greater than 1000 monthly transports) EMS providers were not compliant or documenting the new AB 40 elements correctly. Based on that outreach, EMSA anticipates compliant records to increase from ~79% to ~91% when those providers become compliant.

### **Summary APOT data for September 2025**

- EMSA calculated 90<sup>th</sup> percentile offload time for all general acute care hospitals with emergency departments using the specifications outlined in the emergency regulations on October 16<sup>th</sup>, 2025, for September data. EMSA identified GACHs that exceeded their LEMSA APOT standard, these GACHs will be instructed to implement their hospital APOT reduction protocols. Summary information based on September 2025 APOT data and audits can be found below.
  - 305 of 327 hospitals (93%) had at least one EMS patient transport which met APOT documentation criteria.
  - Of the 305, only 277 (90%) had more than thirty (30) EMS patient transports to their facility for the month of September.
  - 151 of those 277 (59%) hospitals exceeded their local APOT standard.
  - 73 hospitals submitted APOT audit reports.
  - Of these 73 hospitals, 26 (35%) already met their LEMSA APOT standard.
  - There was a total of 3764 discrepancies identified among the 73 completed hospital audits, representing ~.02% of all APOT qualifying records.
  - Of those 3,764 discrepancies identified, 2,375 (64%) of them would not change the patient offload recorded by EMS to be below their LEMSA APOT Standard. This supports the need for additional education surrounding targeted auditing.
  - 38 of 47 (~80%) facilities would not have had their APOT-1 calculations shift to being compliant as a result of their identified discrepancies, assuming all record discrepancies were agreed upon and corrected. 9

of 47 (~20%) facilities may have gone from exceeding their local standard to meeting their local standard if all discrepancies were accepted.

- EMSA is working with our partners to provide additional education surrounding best practices for auditors, specifically focused on targeted auditing by hospitals to gain compliance with local APOT standards.

### **Approach to Bi-Weekly Meetings**

- EMSA will begin bi-weekly meetings no later than the first week of November. EMSA delayed this initiative to ensure maximum provider compliance with the new ePCR requirements and to allow hospitals time to meet the reporting requirements for their APOT reduction plans.
- EMSA will initially focus the bi-weekly meetings on the 15 hospitals experiencing the longest offload delays that exceed their local APOT standards. This targeted approach aims to address the needs of the communities served by these hospitals and to directly influence the reduction of offload delays.
- Delays in funding allocation for EMSA's AB 40 implementation significantly impacted its ability to hire the necessary positions to carry out related activities. As EMSA onboards additional staff, it will expand its approach and outreach strategy. Once staffing resources are sufficient, EMSA will expand the scope of the bi-weekly meetings to include all hospitals exceeding their local APOT standards.

### **Exceedance of Ambulance Patient Offload (APOT) Standards – Detail**

- The following general acute care hospitals were identified as exceeding the local APOT standard established by their local EMS agency (*page 6, below*). In accordance with Title 22, Division, 9, Chapter 1.2, § 100007.02 "Exceedance of APOT Standards - Required Actions," EMSA instructed the general acute care hospitals in the table below to implement their APOT reduction protocol no later than five (5) business days after the date of notification (October 20, 2025). All hospitals received the following detailed statistics and data points used to make this determination:
  - Monthly offload count:
  - 90th percentile APOT:
  - Local APOT standard:
  - Exceedance of standard:
  - Count of records exceeding standard:
  - Percent records above standard:
  - Percent of records needed for compliance:
  - Count of offloads needed to meet standard:
  - Audit Completed (Yes or No):

**Report Note:** Hospitals with less than 60 offloads are excluded from our assessment and the table included in this report for the following reasons:

- Not all EMS provider agencies are reporting to the new data standard, resulting in some hospitals with significant numbers of missing records for transport they received. This deficiency of data may bias the APOT calculation.
- This approach aligns with the California Department of Health Care Services' Data De-Identification Guidelines.

## Local EMS Agency APOT Standards

<b>LEMSA</b>	<b>APOT Standard (Mins)</b>
Alameda County EMS Agency	0:30:00
Central California EMS Agency	0:30:00
Coastal Valleys EMS Agency	0:20:00
Contra Costa County EMS Agency	0:20:00
El Dorado County EMS Agency	0:30:00
Inland Counties EMS Agency	0:25:00
Imperial County EMS Agency	0:20:00
Kern County EMS Agency	0:30:00
Los Angeles County EMS Agency	0:30:00
Marin County EMS Agency	0:20:00
Merced County EMS Agency	0:30:00
Monterey County EMS Agency	0:30:00
Mountain Counties EMS Agency	0:30:00
Napa County EMS Agency	0:20:00
North Coast EMS Agency	0:30:00
Northern California EMS Agency	0:20:00
Orange County EMS Agency	0:30:00
Riverside County EMS Agency	0:30:00
Sacramento County EMS Agency	0:25:00
San Benito County EMS Agency	0:30:00
San Diego County EMS Agency	0:30:00
San Francisco County EMS Agency	0:30:00
San Joaquin County EMS Agency	0:20:00
San Luis Obispo County EMS Agency	0:20:00
San Mateo County EMS Agency	0:20:00
Santa Barbara County EMS Agency	0:30:00
Santa Clara County EMS Agency	0:20:00
Santa Cruz County EMS Agency	0:30:00
Sierra-Sacramento Valley EMS Agency	0:30:00
Solano County EMS Agency	0:30:00
Stanislaus County EMS Agency	0:30:00
Tuolumne County EMS Agency	0:20:00
Ventura County EMS Agency	0:20:00
Yolo County EMS Agency	0:20:00

## Hospitals Exceeding Their Local APOT Standard (1 of 3)

LEMSA	CEMSIS Facility ID	General Acute Care Hospital Name (CEMSIS)	Offload Count	90th APOT	Local APOT Standard
Los Angeles County EMS Agency	20081	Community Hospital of Huntington Park	342	1:25:53	0:30:00
San Diego County EMS Agency	20337	Paradise Valley Hospital	154	1:24:26	0:30:00
Los Angeles County EMS Agency	20328	College Medical Center	167	1:22:24	0:30:00
Los Angeles County EMS Agency	20446	Saint Francis Medical Center	1081	1:21:24	0:30:00
Los Angeles County EMS Agency	20531	Adventist Health White Memorial	198	1:20:12	0:30:00
Los Angeles County EMS Agency	20451	Providence Saint John's Health Center	674	1:13:12	0:30:00
Los Angeles County EMS Agency	20215	Kaiser Permanente, Downey	468	1:11:53	0:30:00
Riverside County EMS Agency	20162	Hemet Valley Medical Center	1257	1:09:58	0:30:00
Los Angeles County EMS Agency	20038	Beverly Hospital	304	1:09:10	0:30:00
Los Angeles County EMS Agency	20401	Santa Monica - UCLA Medical Center and Orthopaedic Hospital	394	1:06:00	0:30:00
Los Angeles County EMS Agency	20244	Lakewood Regional Medical Center	400	1:05:54	0:30:00
Alameda County EMS Agency	62356	Kaiser Permanente, San Leandro Medical Center	653	1:02:44	0:30:00
Los Angeles County EMS Agency	20240	Harbor UCLA Medical Center	885	1:01:40	0:30:00
Los Angeles County EMS Agency	20106	PIH Health Hospital, Downey	467	1:00:48	0:30:00
Los Angeles County EMS Agency	20270	Marina Del Rey Hospital	495	0:56:47	0:30:00
San Diego County EMS Agency	20510	University of California, San Diego Medical Center	224	0:55:42	0:30:00
Los Angeles County EMS Agency	20350	PIH Health Hospital, Whittier	621	0:55:31	0:30:00
San Diego County EMS Agency	20419	Sharp Memorial Hospital	568	0:55:02	0:30:00
Los Angeles County EMS Agency	20129	Foothill Presbyterian Hospital	313	0:52:31	0:30:00
Los Angeles County EMS Agency	20204	Kaiser Permanente, South Bay	439	0:52:09	0:30:00
Los Angeles County EMS Agency	20152	Greater El Monte Community Hospital	223	0:51:55	0:30:00
Alameda County EMS Agency	20185	Kaiser Permanente, Fremont	468	0:51:14	0:30:00
Los Angeles County EMS Agency	20209	Kaiser Permanente, West Los Angeles	487	0:51:08	0:30:00
Los Angeles County EMS Agency	20067	Emanate Health- InterCommunity Hospital	343	0:51:01	0:30:00
San Francisco County EMS Agency	20504	UCSF Medical Center at Parnassus	711	0:50:31	0:30:00
Central California EMS Agency	20186	Kaiser Permanente, Fresno	931	0:50:13	0:30:00
Alameda County EMS Agency	20190	Kaiser Permanente, Oakland Medical Center	652	0:50:06	0:30:00
Los Angeles County EMS Agency	20068	Citrus Valley Medical Center, Queen of the Valley Campus	618	0:50:00	0:30:00
Los Angeles County EMS Agency	20289	Methodist Hospital of Southern California	827	0:49:59	0:30:00
Los Angeles County EMS Agency	20042	Southern California Hospital at Culver City	164	0:49:58	0:30:00
Contra Costa County EMS Agency	20194	Kaiser Permanente, Richmond	955	0:49:55	0:20:00
Alameda County EMS Agency	20004	Alameda County Medical Center, Highland	1061	0:49:48	0:30:00
Los Angeles County EMS Agency	20045	California Hospital Medical Center	615	0:49:47	0:30:00
Los Angeles County EMS Agency	20496	Torrance Memorial Medical Center	738	0:49:45	0:30:00
Los Angeles County EMS Agency	20054	Cedars-Sinai Medical Center	1026	0:49:29	0:30:00
Los Angeles County EMS Agency	20255	MemorialCare Long Beach Medical Center	821	0:49:00	0:30:00
Los Angeles County EMS Agency	20357	Providence Little Company of Mary Medical Center, Torrance	863	0:48:35	0:30:00
San Francisco County EMS Agency	20199	Kaiser Permanente, San Francisco	387	0:48:13	0:30:00
Alameda County EMS Agency	20008	Alta Bates Summit Medical Center, Alta Bates Campus	363	0:48:04	0:30:00
Alameda County EMS Agency	20515	Stanford Health Care - ValleyCare	637	0:47:59	0:30:00
Merced County EMS Agency	20283	Mercy Medical Center, Merced	1235	0:46:56	0:30:00
Los Angeles County EMS Agency	20183	Kaiser Permanente, Baldwin Park	268	0:46:39	0:30:00
Alameda County EMS Agency	20393	San Leandro Hospital	466	0:46:17	0:30:00
San Diego County EMS Agency	20416	Sharp Chula Vista Medical Center	815	0:46:12	0:30:00
Imperial County EMS Agency	20117	El Centro Regional Medical Center	615	0:45:28	0:20:00
Sierra-Sacramento Valley EMS Agency	20284	Mercy Medical Center, Redding	1200	0:45:17	0:30:00
Central California EMS Agency	20265	Madera Community Hospital	428	0:44:59	0:30:00
Central California EMS Agency	20219	Kaweah Delta Medical Center	2186	0:44:51	0:30:00
Central California EMS Agency	20429	Sierra View Medical Center	609	0:44:42	0:30:00

**Report Note:** Hospitals with less than 60 qualifying records were excluded from this assessment to adhere to California Department of Health Care Services' Data De-Identification Guidelines.

## Hospitals Exceeding Their Local APOT Standard (2 of 3)

LEMSA	CEMSIS Facility ID	General Acute Care Hospital Name (CEMSIS)	Offload Count	90th APOT	Local APOT Standard
Riverside County EMS Agency	20559	Temecula Valley Hospital	672	0:44:19	0:30:00
Contra Costa County EMS Agency	20087	Contra Costa Regional Medical Center	442	0:43:59	0:20:00
Riverside County EMS Agency	20374	Riverside Community Hospital	2130	0:43:44	0:30:00
Alameda County EMS Agency	20011	Alta Bates Summit Medical Center, Summit Campus	1173	0:43:38	0:30:00
Los Angeles County EMS Agency	20171	Hollywood Presbyterian Medical Center	517	0:43:31	0:30:00
Riverside County EMS Agency	20441	Rancho Springs Medical Center	656	0:43:07	0:30:00
Riverside County EMS Agency	20278	Menifee Valley Medical Center	322	0:42:56	0:30:00
Los Angeles County EMS Agency	20108	East Los Angeles Doctors Hospital	229	0:42:10	0:30:00
Santa Clara County EMS Agency	20400	Santa Clara Valley Medical Center	1036	0:42:08	0:20:00
Inland Counties EMS Agency	20098	Desert Valley Hospital	148	0:42:04	0:25:00
Riverside County EMS Agency	20211	Kaiser Permanente, Moreno Valley	394	0:42:04	0:30:00
Los Angeles County EMS Agency	20356	Providence Little Company of Mary Medical Center, San Pedro	242	0:41:46	0:30:00
Alameda County EMS Agency	20112	Eden Medical Center	989	0:41:45	0:30:00
Central California EMS Agency	20001	Adventist Health Hanford	1032	0:41:38	0:30:00
Los Angeles County EMS Agency	20207	Kaiser Permanente, Los Angeles	518	0:41:19	0:30:00
San Diego County EMS Agency	62998	UC San Diego Health East Campus Medical Center	183	0:41:00	0:30:00
Riverside County EMS Agency	20388	San Geronio Memorial Hospital	794	0:40:57	0:30:00
Sacramento County EMS Agency	20280	Mercy General Hospital	716	0:40:56	0:25:00
San Francisco County EMS Agency	20447	Saint Francis Memorial Hospital	713	0:40:55	0:30:00
San Diego County EMS Agency	20406	Scripps Memorial Hospital, Encinitas	466	0:40:53	0:30:00
Los Angeles County EMS Agency	20149	Good Samaritan Hospital, Los Angeles	788	0:40:45	0:30:00
Los Angeles County EMS Agency	20055	Centinela Hospital Medical Center	1991	0:40:43	0:30:00
Orange County EMS Agency	20139	Garden Grove Hospital and Medical Center	341	0:40:40	0:30:00
San Diego County EMS Agency	20409	Scripps Mercy Hospital, Chula Vista	753	0:40:33	0:30:00
Central California EMS Agency	20085	Community Regional Medical Center, Fresno	4359	0:40:30	0:30:00
San Diego County EMS Agency	20347	Pomerado Hospital	148	0:40:26	0:30:00
Riverside County EMS Agency	20442	Inland Valley Medical Center	1114	0:40:20	0:30:00
Alameda County EMS Agency	20525	Washington Hospital, Fremont	1011	0:40:01	0:30:00
Los Angeles County EMS Agency	20018	Antelope Valley Hospital	1654	0:39:55	0:30:00
Orange County EMS Agency	20239	La Palma Intercommunity Hospital	117	0:39:36	0:30:00
San Diego County EMS Agency	20417	Sharp Coronado Hospital and Healthcare Center	88	0:39:12	0:30:00
Los Angeles County EMS Agency	20348	Pomona Valley Hospital Medical Center	991	0:39:11	0:30:00
Los Angeles County EMS Agency	20276	Memorial Hospital Of Gardena	886	0:38:58	0:30:00
Orange County EMS Agency	20308	Foothill Regional Medical Center	103	0:37:58	0:30:00
San Francisco County EMS Agency	62636	CPMC-Van Ness	844	0:37:46	0:30:00
San Diego County EMS Agency	20408	Scripps Mercy Hospital	278	0:37:42	0:30:00
Los Angeles County EMS Agency	20333	Palmdale Regional Medical Center	873	0:37:35	0:30:00
Stanislaus County EMS Agency	20119	Emanuel Medical Center	549	0:37:24	0:30:00
Los Angeles County EMS Agency	20385	San Dimas Community Hospital	148	0:37:21	0:30:00
San Diego County EMS Agency	20153	Sharp Grossmont Hospital	2128	0:37:12	0:30:00
Central California EMS Agency	20443	Saint Agnes Medical Center	2716	0:36:58	0:30:00
Santa Clara County EMS Agency	20321	O'Connor Hospital, San Jose	1063	0:36:54	0:20:00
San Joaquin County EMS Agency	20247	Adventist Health Lodi Memorial	746	0:36:26	0:20:00
Contra Costa County EMS Agency	20474	Sutter Delta Medical Center	1064	0:36:14	0:20:00
Orange County EMS Agency	20172	Huntington Beach Hospital	247	0:36:10	0:30:00
Stanislaus County EMS Agency	20213	Kaiser Permanente, Modesto	491	0:36:01	0:30:00
Alameda County EMS Agency	20463	Saint Rose Hospital	403	0:35:58	0:30:00
Central California EMS Agency	20500	Tulare Regional Medical Center	173	0:35:57	0:30:00
Contra Costa County EMS Agency	20180	John Muir Medical Center, Walnut Creek	1082	0:35:56	0:20:00
Stanislaus County EMS Agency	20101	Doctors Medical Center	1543	0:35:40	0:30:00

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## Hospitals Exceeding Their Local APOT Standard (3 of 3)

LEMSA	CEMSIS Facility ID	General Acute Care Hospital Name (CEMSIS)	Offload Count	90th APOT	Local APOT Standard
Los Angeles County EMS Agency	20316	Norwalk Community Hospital	72	0:35:37	0:30:00
Sacramento County EMS Agency	20475	Sutter Medical Center - Sacramento	1507	0:35:15	0:25:00
Contra Costa County EMS Agency	20208	Kaiser Permanente, Walnut Creek	815	0:35:09	0:20:00
Riverside County EMS Agency	20090	Corona Regional Medical Center	904	0:35:09	0:30:00
Los Angeles County EMS Agency	20460	St. Mary Medical Center, Long Beach	897	0:35:00	0:30:00
San Joaquin County EMS Agency	20457	St. Joseph's Medical Center of Stockton	2155	0:34:38	0:20:00
Merced County EMS Agency	20274	Memorial Hospital Los Banos	252	0:34:00	0:30:00
Los Angeles County EMS Agency	20377	Ronald Reagan UCLA Medical Center	453	0:33:57	0:30:00
Los Angeles County EMS Agency	20360	Providence Saint Joseph Medical Center	1191	0:33:48	0:30:00
Alameda County EMS Agency	20059	Children's Hospital & Research Center Oakland	142	0:33:45	0:30:00
San Francisco County EMS Agency	20462	St. Mary's Medical Center, San Francisco	575	0:33:44	0:30:00
Riverside County EMS Agency	20535	Loma Linda University Medical Center, Murrieta	842	0:33:38	0:30:00
Sacramento County EMS Agency	20508	UC Davis Medical Center	1458	0:33:33	0:25:00
San Francisco County EMS Agency	20050	CPMC Mission Bernal Campus	674	0:33:31	0:30:00
Contra Costa County EMS Agency	20214	Kaiser Permanente, Antioch	856	0:33:29	0:20:00
Orange County EMS Agency	20527	West Anaheim Medical Center	657	0:33:27	0:30:00
San Francisco County EMS Agency	20048	California Pacific Medical Center, Davies Campus Hospital	329	0:33:13	0:30:00
Orange County EMS Agency	20256	UCI Health - Los Alamitos	469	0:33:03	0:30:00
San Diego County EMS Agency	20561	Palomar Medical Center	1424	0:33:02	0:30:00
Central California EMS Agency	20070	Clovis Community Medical Center	2137	0:33:00	0:30:00
Riverside County EMS Agency	20195	Kaiser Permanente, Riverside	551	0:32:48	0:30:00
Los Angeles County EMS Agency	20210	Kaiser Permanente, Woodland Hills	187	0:32:41	0:30:00
Ventura County EMS Agency	20453	Saint John's Regional Medical Center	1083	0:32:20	0:20:00
San Francisco County EMS Agency	20386	Zuckerberg San Francisco General Hospital and Trauma Center	1238	0:32:19	0:30:00
San Diego County EMS Agency	62989	Kaiser San Marcos Medical Center	267	0:31:48	0:30:00
Orange County EMS Agency	20560	Kaiser Permanente, Anaheim	245	0:31:36	0:30:00
Los Angeles County EMS Agency	20528	West Hills Hospital and Medical Center	521	0:31:18	0:30:00
San Joaquin County EMS Agency	20484	Sutter Tracy Community Hospital	328	0:31:12	0:20:00
San Diego County EMS Agency	20407	Scripps Memorial Hospital, La Jolla	336	0:31:11	0:30:00
San Joaquin County EMS Agency	20094	Dameron Hospital	637	0:30:51	0:20:00
Sacramento County EMS Agency	20282	Mercy Hospital of Folsom	297	0:30:39	0:25:00
San Diego County EMS Agency	62393	Kaiser Permanente, San Diego Medical Center	352	0:30:34	0:30:00
Central California EMS Agency	20427	Adventist Health Reedley	215	0:30:16	0:30:00
Riverside County EMS Agency	20375	Riverside University Health System Medical Center	1766	0:30:09	0:30:00
Los Angeles County EMS Agency	60988	Martin Luther King, Jr. Community Hospital	967	0:30:07	0:30:00
Sacramento County EMS Agency	20288	Methodist Hospital of Sacramento	713	0:29:54	0:25:00
Contra Costa County EMS Agency	20179	John Muir Medical Center, Concord	1076	0:29:14	0:20:00
Santa Clara County EMS Agency	20202	Kaiser Permanente, Santa Clara Medical Center and Medical Offices	772	0:27:10	0:20:00
Santa Clara County EMS Agency	20150	Good Samaritan Hospital, San Jose	1008	0:26:57	0:20:00
San Joaquin County EMS Agency	20212	Kaiser Permanente, Manteca	377	0:26:40	0:20:00
San Joaquin County EMS Agency	20099	Doctors Hospital of Manteca	380	0:26:38	0:20:00
Ventura County EMS Agency	20261	Los Robles Hospital & Medical Center	962	0:26:37	0:20:00
Sacramento County EMS Agency	20205	Kaiser Permanente, South Sacramento Medical Center	1324	0:26:06	0:25:00
Imperial County EMS Agency	20344	Pioneers Memorial Hospital	340	0:25:41	0:20:00
Santa Clara County EMS Agency	20368	Regional Medical Center of San Jose	1360	0:23:50	0:20:00
San Joaquin County EMS Agency	20391	San Joaquin General Hospital	1188	0:23:37	0:20:00
Santa Clara County EMS Agency	20200	Kaiser Permanente, San Jose	835	0:23:12	0:20:00
Ventura County EMS Agency	20084	Community Memorial Hospital, San Buenaventura	799	0:22:14	0:20:00
Santa Clara County EMS Agency	20115	El Camino Hospital	853	0:20:48	0:20:00
San Mateo County EMS Agency	20342	Mills-Peninsula Medical Center	1088	0:20:40	0:20:00
Santa Clara County EMS Agency	20116	El Camino Hospital Los Gatos	127	0:20:15	0:20:00

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