BOROUGH OF NAUGATUCK

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HAND DELIVERED AT PUBLIC HEARING (3/19/2014)

March 19, 2014

The Honorable Terry B. Gerratana and Susan M. Johnson, Co Chairs
The Honorable Jason C. Welch and Prasad Srinivasan, Ranking Members
Public Health Committee
Connecticut General Assembly
Legislative Office Building, Room 3000
300 Capital Avenue
Hartford, CT 06106

RE: Testimony in Support of adding EMS PSA Task Force Recommendation #5 to HB 5542

Dear Senator Gerratana, Representative Johnson, Senator Welch, Representative Srinivasan, and Honorable Members of the Public Health Committee:

We strongly urge your support of including EMS PSA Task Force Final Report Recommendation 5 to HB 5542.

The PSA system was created with good intentions to remove the selection of local emergency medical providers from the local political process. While we can appreciate the public benefit for such an objective, the current system no longer works. Allowing OEMS to grant an irrevocable license to a third party with no input from municipal officials is contrary to free market principles which form the basis of almost all town or special taxing district bidding procedures.

In 2012, Naugatuck Ambulance, Inc., the entity possessing the PSA for the Borough of Naugatuck, attempted to change the manner in which paramedic services were provided. Subsequently, on February 1, 2014, with no formal notice to the Borough of Naugatuck, Naugatuck Ambulance, Inc., did in fact change the manner in which paramedic services were provided. While this downgrade in service was within the thresholds and standards set by the current PSA System, the change resulted in a severe downgrade in the past decades provided

level and quality of service and patient care, negatively impacted our community and has created an emergency situation. This event has resulted in the Borough of Naugatuck officially notifying Department of Public Health, Director of Office of Emergency Medical Services of the situation.

In a system governed by market principals it is certainly the right of a private entity to determine the level of non-mandated services it will offer to a client. The client in this instance, however, is the Borough of Naugatuck. The ability of a local government to freely bid the level of emergency medical care it desires is questionable given the constraints of the current PSA system. Without changes to the existing system, the license holder of a PSA can dictate the level of non-mandated care available in a community and/or leverage ownership of the PSA to dictate compensation for delivery of the same.

In addition, under the current structure, there is no routine review of population and demand of a municipality in order to ensure the appropriate level of service to meet with the need and population of the community. The current system allows this determination and decision to be made solely by the private entity holding the PSA. Very often this decision is determined by the profit margin. While the members of the community hold the local leadership responsible for ensuring their safety, local leadership has no true input or involvement in this process without ownership of the PSA. Part of the current structure includes the creation and yearly update of an "Emergency Medical Services Plan" for the community. Once again, ownership of the PSA is held by a private entity. While community leadership may certainly create and have input in this plan, it has no leverage in guaranteeing the plan is followed by the owner of the PSA for the benefit of their community.

Recommendation #5 is the Alternative Provision of PSA Responsibilities. This recommendation simply states that municipalities shall have the right to submit a Local EMS Plan for consideration to DPH for the alternative provision of primary service area responder responsibilities.

Recommendation #5 does not offer any guarantees of a change of EMS provider, it simply offers a municipality, which believes that their community can better served by a different EMS provider, the opportunity to have their specific case heard by DPH. Recommendation #5 takes into account all of the arguments against PSA reform that have been made by the commercial ambulance services. Recommendation #5 requires DPH to schedule a formal hearing, notice all of the parties having interest in the matter, and to hear testimony on the very concerns that the commercial ambulance services have brought forward. These issues include the impact on patient care, the Local EMS Plan, EMS System sustainability, impact on the local, regional and statewide EMS System, and recommendations from Medical Control / Sponsor Hospital.

Recommendation #5 gives DPH the authority to hear all of the facts of a particular situation, to evaluate them on their merits, and to determine who is positioned to offer the best patient care in a community going forward. In effect, this is perhaps the most important element of the recommendations. It brings the system into alignment with other modern delivery systems which provide an opportunity for full due diligence, evaluation and quality assessment. Modern healthcare medical systems encourage evaluation and provide the opportunity for change when the provider or system is not aligned.

The PSA Task Force truly saved the best for last. Recommendations 1 through 4 will all improve the EMS Delivery System in Connecticut, but Recommendation #5 speaks to the very issues that drove hundreds of Connecticut's Fire, Police, EMS and other municipal personnel to come to the Hartford last year, to testify at public hearings, and / or to reach out to their legislators. This has been a highly motivated group of participants all of who have responsibilities in their own municipalities. These are the people on the ground floor.

Most, if not all, commercial ambulance services do not support Recommendation #5, including Naugatuck Ambulance. The existing statutes and regulations do not include specific performance measures for EMS providers. There are no established required response times. A provider simply has to show up in order to meet their obligation as a Primary Service Area Responder. The important takeaway is that municipalities are directly responsible to their citizens to provide the highest quality care through the best delivery system. The existing system is an obstacle to this goal in that it has established artificial protection for providers who don't necessarily have a vested interest. Municipalities serve the needs of their resident before, during and after emergencies. The buck always starts and stops at the local level.

We recognize there are complexities associated with the current PSA system, and many years of history which have led to its current structure. It is imperative, however, that local communities have the ability to ensure the highest level of emergency care at the lowest cost. Perpetuating a system that denies such local control will continue to burden Connecticut cities and towns unnecessarily. We respectfully request your support of inclusion of the EMS PSA Task Force Final Report Recommendation 5 to HB 5542.

Sincerely,

Robert A. Mezzo
Mayor

Tamath K. Rossi
Deputy Mayor
Chair - Emergency Medical
Service Oversight Committee

Kenneth Hanks
Fire Chief