



Association of Connecticut Ambulance Providers

Aetna Ambulance -:- Ambulance Service of Manchester -:- American Ambulance Service
American Medial Response -:- Campion Ambulance Service -:- Hunter's Ambulance Service

Testimony of the Association of CT Ambulance Providers

In Opposition to

COMMITTEE BILL NO. 66, AN ACT CONCERNING NON-EMERGENCY TRANSPORTATION FOR ELDERLY PERSONS AND PERSONS WITH DISABILITIES CONFINED TO A STRETCHER.

Transportation Committee Hearing, February 13, 2019

Senator Leone, Representative LEMAR and members of the Transportation Committee: The Association of Connecticut Ambulance Providers (ACAP) appreciates the opportunity to offer testimony in opposition of **COMMITTEE BILL NO. 66, AN ACT CONCERNING NON-EMERGENCY TRANSPORTATION FOR ELDERLY PERSONS AND PERSONS WITH DISABILITIES CONFINED TO A STRETCHER.**

Connecticut's current non-emergency medical transportation system is unique, well established and has a high integrity of oversight for patient evaluation, determination of medical necessity and assignment of the lowest cost, and most appropriate mode of transportation.

This proposed bill would enable temporary, or permanent livery permit holders to use stretcher vans to transport persons with disabilities or elderly persons who require "non-emergency transportation and must be transported on a stretcher but who do not require medical services during transport."

A Matter of Public Safety

Connecticut has well established regulations for training, certification, equipment, safety, and provision of ambulance and stretcher transportation under the DPH. In addition, the state has well established regulations, vehicle, equipment and safety standards for Invalid Coach and wheel chair van transportation through DPH and DOT. ***There are no standards or regulations for stretcher vans.*** Our member's' number one priority is the health and safety of the individual during their trip to or from their residence to their location of appointment /health care facility. Due to their medical condition and disability, some patients require non-emergency transportation by stretcher in an ambulance. These patients require the special training of ambulance personnel to lift, move, and carry the patient into and out of the hospital, skilled nursing facility or residence. Ambulance transportation requires specialized equipment and training for the personnel to safely move and transport.

The stretcher is a specialized piece of equipment regulated by the FDA. Its mounting and attachment in the ambulance meets significant safety standards set by the federal government and inspected, certified and enforced by the State of Connecticut Department of Public Health.

The proposed bill suggests ***"...such livery permit holder has received training in the lifting, moving and transport of a 30 person on a stretcher that is equivalent to such training provided to emergency medical services personnel, as defined in section 19a-180b."*** We find this extremely concerning. The minimum amount of training required by DPH to be certified as an EMT is 150 hours. Most courses provide an average of 200 hours of comprehensive, federally prescribed training. Ambulances have the necessary equipment to deal with unforeseen medical conditions during transport. Ambulances have specially credentialed health care staff in the vehicle with the patient during transport. Ambulance staffs know how to properly move the patient, how to adjust the stretcher and how to attend to the needs of the patient during transport.

Medicaid patients who are ambulatory, don't require special lifting or moving equipment, and don't require medical surveillance are transported appropriately and at a lower cost, in vehicles such as livery cars and wheel chair vans and not in ambulances.

Higher Cost Passed Directly to Patient and/or State Medicaid Program.

The Center for Medicare and Medicaid Services (CMS) establishes medical necessity guidelines at the federal level that assure only patients truly in need of stretcher services are using ambulances. These medical necessity rules are being strictly followed at the state level as well.

Medicare (and Medicare Advantage Plans) **does not** pay for “stretcher van” transports. Adding stretcher vans to the Medicaid program may actually increase state expenditures and not save dollars. The only mode of non-emergency medically necessary transportation that Medicare will pay for patients (including dual eligible patients) is transport by ambulance. **Medicare will not pay for non-emergency transport by stretcher van, wheel chair vans, etc...only ambulances.** For the duals who have a medical necessity that requires transport by an ambulance (i.e. many SNF patients and dialysis patients need to be transported on a gurney), CT Medicaid presently incurs minimal to no cost (coinsurance or deductible). **For every one of the full duals that moves from an ambulance transport to transport by stretcher van, the payment moves from the Medicare ledger to the Medicaid ledger and the state Medicaid program bears the full cost of the transport .**

The following pages serve to graphically describe the two permitted modes of transportation (Ambulance Stretcher and Wheel Chair) and a picture of a stretcher van.

I believe Connecticut’s options of regulated non emergency medical transportation are sufficient in their design and offer the most appropriate and cost effective means of transportation to elderly and disabled patients requiring transport and urge the committee to oppose the passage of this bill.

Thank you,

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Typical Stretcher Compartment of Ambulance

Regulated, Inspected and Certified to Federal Safety Standards by State of Connecticut Department of Public Health



State Certified EMT sits with patient, communicates and is able to detect distress and treat appropriately if needed.

Typical Compartment of Wheel Chair Van

Regulated, Inspected and Certified to Federal Safety Standards by State of Connecticut Department of Public Health or DOT.



Driver secures patient using approved devices. Patient is forward facing allowing for driver to communicate and assess patients demeanor.



“Stretcher Van”

No regulations currently exist in Connecticut for safety restraints, securing, personnel training, inspecting & certification of stretcher vans.



Van driver sits forward facing, operates the vehicle and is unable to communicate, detect distress and treat appropriately.

Wheel Chair Lift.

Rear-facing Stretcher in chair van.

