



Austin-Travis County EMS Staff Findings Regarding an Application for the City of Austin Non-Emergency Medical Transfer Franchise for Republic EMS

April 27, 2018

Background

In order for a private ambulance company to provide non-emergency transfer services within the limits of the City of Austin, the provider must hold a franchise from the City. Non-emergency transfers typically occur between skilled nursing facilities, nursing homes and hospitals, and are usually prescheduled by medical personnel. Currently, three companies hold such franchises, Acadian Ambulance Service of Texas, Inc., American Medical Response of Texas, Inc. (AMR), and Allegiance Mobile Health.

Republic EMS applied for a franchise with the City of Austin in June 2017. Republic EMS is requesting a franchise for a five-year term. All the required application elements have been submitted and the application fee has been paid in full.

Application Review

Republic EMS is headquartered at 33300 Egypt Lane Suite D300, Magnolia, Texas. Republic EMS currently does not have an office in Austin but will have to establish a station if the franchise is approved.

The performance bond for \$10,000 is carried by VGM Insurance. General liability and automobile liability insurance are provided through Acord Insurance at levels that meet or exceed those required by the franchise ordinance. The City of Austin will be named on both the performance bond and the certificate of insurance if the franchise is granted.

Inspections by ATCEMS revealed that the two vehicles that will be used if the franchise is granted meet basic standards for emergency ambulances based on federal ambulance specifications, as well as general ambulance manufacturing standards. Odometer readings were all well within the mileage and age limits as specified in Chapter 10-2-82.

A preventive maintenance program is in place and was reviewed by staff for the proposed franchise vehicles. An inspection was completed on both of the vehicles to insure compliance with the required equipment as listed in TAC 157.11. During the inspection one minor issue was identified - the glucometer test strips in unit #112 had expired by more than 90 days, Republic EMS's staff assured the department that the error would be corrected.

Republic EMS and the inspected franchise ambulances hold the appropriate current licenses through the Texas Department of State Health Services (TDSHS) which are valid through September 30, 2018.

Republic EMS currently has 185 employees, and 10 stations throughout the State of Texas. ATCEMS will have to verify the certification of the employees that will be assigned to the Austin operation if the franchise is granted. ATCEMS will review state certifications to insure that all are current and no suspensions or revocations were found for the company or its employees.

ATCEMS staff reviewed 247 Patient Care Reports (PCRs) for service provided by Republic EMS, the original request was for 250 PCRs, 3 patient care records were not received. The records were reviewed using multiple data points, including response times, level of service provided, medical coding, origin and destination modifiers, dispatch times, medical documentation and Medicare/Medicaid compliance.

The original PCR submission was received just prior to Hurricane Harvey in August 2017 which caused significant delays completing the PCR audit. We received three separate submissions of data, the files were created on 8/18/2017, 09/07/2017 and 01/08/2018. There were some technical issues where the electronic PCRs would not open, which required the ATCEMS to request copies of the damaged files.

Staff found multiple issues during the audit that caused significant concerns. The documentation on the PCRs created substantial confusion in methodology used to process the transports. Based on 247 PCRs reviewed 163 or sixty six percent (66%) indicated the "Run Type" as Non-emergent and of those 156 PCRs indicated the "Scene Priority" as Non-emergent. The billing procedure code used on 160 or ninety eight percent (98%) of these accounts showed the transports were billed as an emergent transports even though the PCR documentation contradicted the emergency charge level. Staff also reviewed "response urgency" and found that 56 PCRs were documented with non-immediate responses, staff found that 53 or ninety four percent (94%) of those PCRs were billed emergent. Staff also found examples of PCRs being billed at a higher level of service than documentation indicated.

Staff reviewed the 42 Medicare/Medicaid related accounts and found that 14 or (33%) of those accounts had overcharged mileage due to the rounding up the miles charged.

There were also a large number of PCRs documented with the call origination being from a 911 Public Safety Answering Point (PSAP), this gives the appearance that origination of the call was from a 911 even though Republic EMS does not have a PSAP.

Staff found that Republic EMS almost exclusively provides services to free standing emergency rooms for transports to a traditional hospitals. This selective transport model did not provide staff with comprehensive example of non-emergency transport experience by the provider.

Based on the findings during the application review, staff does not feel that a public convenience will be served by awarding an additional franchise at this time. The City of Austin has three approved franchises, American Medical Response and Acadian Ambulance Service who are currently providing non-emergent transfers with Allegiance Mobile Health beginning service in June 2018.