Memorandum

MIAMI-DADE COUNTY

Date: November 8, 2012

Agenda Item No. 8(M)(3)

To: Honorable Chairman Joe A. Martinez
and Members, Board of County Commissioners

From: Carlos A. Gimenez
Mayor

Subject: Resolution Denying an Application for a Certificate of Public Convenience and Necessity to Advanced Ambulance Services, LLC to Provide Ground Ambulance Service

RECOMMENDATION

It is recommended that the Board of County Commissioners (Board) deny an application by Advanced Ambulance Services, LLC for a Certificate of Public Convenience and Necessity to provide ground ambulance service. This recommendation is based on the results of the Triennial Private Ambulance Service Market Survey submitted to the Board in May 2011. The Survey indicated that a high quality of ambulance service was already being provided throughout the County and that there was no need for additional providers. Additionally, existing ambulance providers offer the same type specialty service proposed by Advanced Ambulance Services, LLC.

SCOPE

This Certificate of Public Convenience and Necessity is Countywide, allowing the certificate holder to operate in unincorporated and incorporated areas of Miami-Dade County.

FISCAL IMPACT/FUNDING SOURCE

Licensing and operating permit fees are collected by the Business Affairs Division of the Department of Regulatory and Economic Resources to support regulatory activities. There is an annual regulatory fee of $500 per certificate and $625 per vehicle that will yield $3,625 in revenue annually for the new certificate and the five (5) ambulance units that the company proposes to operate. The initial application fee paid by the company was $1,500.

TRACK RECORD/MONITOR

Not applicable as this is a denial.

BACKGROUND

Advanced Ambulance Services, LLC, a subsidiary of Larkin Community Hospital, Inc., has submitted an application to obtain a Certificate of Public Convenience and Necessity to provide ground ambulance service. Chapter 4 of the Code provides that it shall be unlawful for any person, firm, corporation, or other business or governmental entity to provide or advertise that it provides ambulance service anywhere upon the streets of Miami-Dade County or in the air space above Miami-Dade County, without first obtaining a Certificate of Public Convenience and Necessity. Providers are also required to obtain a license from the State of Florida's Department of Health, Bureau of Emergency Medical Services; however, as a condition for obtaining the State license, a Certificate of Public Convenience and Necessity must first be obtained from the County.

The Code provides that the Board may consider and act upon private applications for Certificates of Public Convenience and Necessity where the Board by a two-thirds (2/3) vote of the entire membership finds that the public convenience and necessity require the issuance of additional certificates. In addition, the Code provides that in reaching its determination, the Board shall consider the application, the Mayor's report and recommendation, all matters presented during the public hearing, and the following criteria:

- Financial ability, including adequate liquid assets to sustain a new operation during an eighteen month start-up period;

- Adequacy of the management plan;
- Any recommendations from municipalities;
- The benefits that will accrue to the public interest;
- The community's need for the proposed service, including a response time analysis of existing private providers for the previous 3 years as compared to benchmark response times stated in each provider's most recent application and the quality of existing services as determined by the results of the comprehensive market survey conducted during the year preceding the term for certificate renewal and acceptance of new applications.

The recommendation for denial is based on the results of the last Triennial Private Ambulance Service Market Survey that was submitted to the Board in May 2011 which showed that a high quality of ambulance service was being provided throughout the County and that there was no need for expansion of providers. Currently, Larkin Community Hospital uses the services of several ambulance providers when transporting its patients to and from its facilities and the Department of Regulatory and Economic Resources (RER) has not received consumer complaints regarding the lack of available ambulance service.

A notice of the application filing was transmitted to all County municipalities and certificate holders. Objections were received from four (4) of the six (6) existing private ambulance providers (attached). American Medical Response, Medics Ambulance Service, Miami-Dade Ambulance Service and American Ambulance Service indicated in their objection letters that the current ambulance companies were capable of providing the specialized service that Larkin Community Hospital's patients require. They also stated that because of changes in the Medicare program less work was expected for the existing providers and that the applicant did not meet all of the requirements of the Code.

Jack Osterholt, Deputy Mayor

MEMORANDUM

(Revised)

TO: Honorable Chairman Joe A. Martinez and Members, Board of County Commissioners

DATE: November 8, 2012

FROM: R. A. Cuevas, Jr. County Attorney

SUBJECT: Agenda Item No.8(M)(3)

Please note any items checked.

_____ **"3-Day Rule" for committees applicable if raised**

_____ **6 weeks required between first reading and public hearing**

_____ **4 weeks notification to municipal officials required prior to public hearing**

_____ **Decreases revenues or increases expenditures without balancing budget**

_____ **Budget required**

_____ **Statement of fiscal impact required**

_____ **Ordinance creating a new board requires detailed County Manager's report for public hearing**

_____ **No committee review**

_____ **Applicable legislation requires more than a majority vote (i.e., 2/3's ____, 3/5's ____, unanimous_____) to approve**

_____ **Current information regarding funding source, index code and available balance, and available capacity (if debt is contemplated) required**

Approved _____ Mayor
Veto _____
Override _____

Agenda Item No.8(M)(3)
11-8-12

RESOLUTION NO. _____

RESOLUTION DENYING AN APPLICATION FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO ADVANCED AMBULANCE SERVICES, LLC TO PROVIDE GROUND AMBULANCE SERVICE

WHEREAS, this Board desires to accomplish the purposes outlined in the accompanying memorandum, a copy of which is incorporated herein by reference,

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COUNTY COMMISSIONERS OF MIAMI-DADE COUNTY, FLORIDA, that this Board, in accordance with Chapter 4, Article I of the Code, denies a Certificate of Public Convenience and Necessity to Advanced Ambulance Services, LLC to provide ground ambulance service in Miami-Dade County.

The foregoing resolution was offered by Commissioner , who moved its adoption. The motion was seconded by Commissioner and upon being put to a vote, the vote was as follows:

Joe A. Martinez, Chairman
Audrey M. Edmonson, Vice Chairwoman

Bruno A. Barreiro	Lynda Bell
Esteban L. Bovo, Jr.	Jose "Pepe" Diaz
Sally A. Heyman	Barbara J. Jordan
Jean Monestime	Dennis C. Moss
Rebeca Sosa	Sen. Javier D. Souto
Xavier L. Suarez	

The Chairperson thereupon declared the resolution duly passed and adopted this 8th day of November, 2012. This resolution shall become effective ten (10) days after the date of its adoption unless vetoed by the Mayor, and if vetoed, shall become effective only upon an override by this Board.

MIAMI-DADE COUNTY, FLORIDA
BY ITS BOARD OF
COUNTY COMMISSIONERS

HARVEY RUVIN, CLERK

By:_____
Deputy Clerk

Approved by County Attorney as
to form and legal sufficiency.

Bruce Libhaber

VIA EMAIL

January 20, 2012

Mr. Raul Gonzalez, Special Projects Administrator 2
Miami-Dade County
For-Hire Passenger Transportation
Business Affairs and Consumers Protection
Sustainability, Planning and Economic Enhancement
140 West Flagler Street, Suite 904
Miami, FL 33130

Re: Application for Certificate of Public Convenience and Necessity for Private Entity Ambulance Operation by Advanced Ambulance Services, LLC

Dear Mr. Gonzalez:

The purpose of this letter is respectfully ask the County to reject Advanced Ambulance Services' application for an ambulance operation COPCN based on the lack of determining a need for additional Private Providers within Miami Dade County by the applicant. The applicant's Statement of Determining Need undoubtedly failed to determine such a need. The three reasons provided by Advanced Ambulance Services, LLC for determining need were as follows:

- *"Federal inmates from the following correctional facilities: Krome Detention Center, Federal Correctional Institution and Federal Detention Center"*
- *"Patients with psychiatric disorders"*
- *"Patient who are Baker Act"*

AMR respectfully requests the County to reject the application based on the following grounds, as described more fully herein:

- Patients from correctional facilities are currently provided medical transportation by the existing Private Providers in Miami Dade County. Not only does AMR itself provide a large majority of the medical transportation needs for correctional/detention facilities, AMR was selected by Miami Dade County officials to be the provider of urgent and non-urgent ambulance transportation for correctional facilities in Miami Dade County through an extensive bid process based on AMR's overall capabilities to handle these types of patients.
- Psychiatric disorders do not require any type of special training outside of the State of Florida curriculum for EMTs and Paramedics. All certified EMTs and Paramedics are

7255 N.W. 19 Street, Suite C, Miami, Florida 33126
Phone (305) 496-5072 Fax (305) 592-8640

trained to handle behavioral emergencies (i.e. psychiatric disorders). Additionally, in instances where a non-emergency transport is needed for a psychiatric patient, the patient generally needs no medical intervention; it is supervision/monitoring they need during the non-emergency transport. In cases where the patient is exhibiting behavior that would require medical care or intervention by ambulance personnel, then these types of transports, as described by Chapter 4 of the Code of Miami Dade County, would require transportation by either governmental fire rescue entities and/or the County's *contracted* Private Provider. Psychiatric disorders do not require any special or additional training by our State's efficient and well-trained EMT and Paramedics.

- Often, Baker Act patients go hand-in-hand psychiatric/behavioral episodes. Baker Act patients also do not require any type of special training. In fact, there are additional resources available to assist EMTs and Paramedics (Fire or Private) such as Law Enforcement. Florida's Regional Common EMS Protocols suggest that "all individuals being transported for psychological evaluation under the premises of the Baker Act should be accompanied by a police officer. The paramedic in charge shall determine whether the police officer will ride in the back or follow behind the Rescue Unit." Additionally, Florida Statute Chapter 394.463 – Mental Health relates to the authorization of police, physicians, and the courts to dictate certain medical care for persons who pose a threat to themselves or to others. All these types of transports are currently being handled by the existent COPCN holders and do not warrant additional COPCNs. Again, these types of transports require no special training and those urgent or emergent in nature would not be handled by a non-emergency COPCN holder.

Other factors described by the applicant, Advanced Ambulance Services, which bear no weight nor prove a need in Miami Dade County for a Private Ambulance COPCN are as follows:

- *"In 2009, The U.S. Census estimates showed Miami-Dade County grew significantly. The census reported an estimated population of 2,500,625, a significant growth from the 2000's count of 2,253,632; a net growth of approximately 246,993 residents. This is over a ten percent growth rate and it is only expected to increase exponentially in the years to come (with counts possibly reaching 3 million by the year 2026). This also means that there is an increase in the population from the time the last vendor was approved to serve in the Miami-Dade County area. At this rate the demand for ambulatory service will increase in the near future. Larkin Community Hospital treats patients from all over Miami-Dade County however, the transportation service currently available to these patients is limited."*

Firstly, the applicant states the demand for ambulatory service is what will increase in the near future. Ambulatory services are comprised of ambulatory (residents that can walk), wheelchair and stretcher van transportation; all of which are not transported in a licensed ambulance vehicle nor require medical treatment (such treatment is not permitted in such non-licensed vehicles). Secondly, of the 2.5 million in Miami Dade population, the inmate population for the entire State of Florida is approximately 102,000. If all of Florida's inmates were housed in Miami Dade County, it would account for 4% of the population. The actual inmate population for Miami Dade County specifically is approximately 8,000 which is less than 1%; roughly 0.3%. If all 8000 inmates required medical transportation 5 times per year, each currently licensed ambulance (not including Fire Municipality vehicles) would run approximately ½ a transport per day or 1 transport every other day. This is highly unlikely, but in any case, could be handled by

the current Private COPCN holders. Additionally, according to our County's 5-Year Crime Comparison report released in 2011, it shows the overall crime rate in Miami Dade County to have dropped 3 years in a row. An overall 6% drop and a 12% drop in violent crimes; a 22% decrease in violent crimes since 2006. Not only does the data not support an increase in inmates that may or may not require medical transportation, the approximate 246,993 resident increased stated by the applicant is merely less than 25,000 additional residents per year which would equate to a possible increase of about 75 total additional inmates in all of Miami Dade County per year. Lastly, the applicant discusses an increase in the "near future", not a *current* need.

- *"Larkin Community Hospital is growing into a campus. The hospital has recently acquired two more properties and going through an expansion that includes the following:*
  - *New PET CT suite*
  - *New Angiogram suite*
  - *New Bariatric surgery program*
  - *New Home Health services property*
  - *New corporate offices"*

To start with, the addition of services provided by any medical facility may in fact generate more transports in and out of that particular facility (in most cases it is not necessarily ambulance transportation), but it does not change the amount of transports within our County. It merely shifts the transports from one facility to another. With the numerous hospital expansions, new hospitals and new urgent care centers, we have not seen a marked increase in transports; merely a shift from where transports originate or a shift in transports among existing service providers. Secondly, with the *possible* exception of the New Bariatric surgery program, the other expansions would very seldom generate the medical necessity needed in a patient for ambulance transportation; especially a New Corporate Office. Additionally, there was no mention of their Bariatric capabilities. Bariatric patients that require ambulance transportation should be transported in a vehicle specially outfitted to transport this patient base safely and comfortably. The current Private and County COPCN holders have such vehicles in operation.

- *"In 2009 five units consisting of one ground ALS and four ground BLS were approved for Miami Children's Hospital. Miami Children's Hospital was granted a Certificate of Public Convenience and Necessity since they serve the pediatric population which requires special ambulatory service..."*

Miami Children's Hospital ambulance team is comprised of highly trained medical professionals that are above the scope of EMTs and Paramedics. These hospital neonate and pediatric teams are generally comprised of Neonate/Pediatric Critical Care Nurses. These types of transports also require specially outfitted ambulances outside of the normal ambulance configurations. To compare the needs of a children's hospital to Larkin Community's needs, is not comparing apples to apples. Miami Children's Hospital is a licensed *Specialty* Hospital. Larkin Community Hospital respectfully is 1 of 22 licensed Acute Care Hospitals in Miami Dade County.

In review of the application, there were discrepancies in what was committed by the applicant, omissions or very vague responses regarding the Management Plan and other key County requirements. Some examples are:

- Applicant failed to meet the minimum five (5) years of ambulance experience. In fact, the applicant checked "No" on #8 of the application where it asks if the applicant has been engaged in the ambulance service industry within the preceding five (5) year.
- With the extraordinary start up costs (5 new ambulances fully equipped to meet the state requirements), Communications Center with CAD, DriveCAMs and GPS systems for each ambulance, medical supplies and medications, licensing and permitting fees (state and local), just to name a few, the proforma submitted to the County was grossly understated on expenses and overstated on revenue. Based the true start up costs, the applicant's financial status and the D&B report submitted, it should raise the question on the financial stability and viability of Advanced Ambulance Services. Does the applicant fulfill the County's Chapter 4 requirement to show evidence of adequate liquid assets to sustain a new operation during an eighteen (18) month start up period?
- Inconsistencies throughout the application/exhibits regarding commitments on Communication equipment and software.
- No quantifiable Vehicle Maintenance Program. In the application, the Fleet Mechanics are referred to as "qualified to inspect and repair equipment problems. The mechanics will know how to repair wheelchairs, wheelchair stabilizing units, patient lifts and stretchers". No mention of minimum preventative maintenance schedules and qualifications/certifications to perform preventative/mechanic work on ambulance vehicles.
- They have committed to a Communications Center with 24/7 availability, yet they committed to hiring one call taker and one dispatcher. These two future employees could safely and effectively cover only 8 to 12 hours per day, 4 to 5 days per week only and leaving at least 12 hours unstaffed in their communications center all 7 days of each week.

In conclusion, we respectfully ask the County to reject Advanced Ambulance Services, LLC's application for COPCN based on no experience in such a crucial and delicate healthcare field by the applicant or General Manager, inconsistencies and not meeting all requirements set forth in this application process and last, but not least, there was no current need nor future need for an additional certificate holder proven. The current number of transports vs the current number of permits in our County barely supports the need for the number of permits currently held by Privates in Miami Dade County. Current Private Providers have excess capacity based on future planning by the existing Providers; therefore any potential growth in need has already been planned for by the existing Providers.

Sincerely,

Barbara Santiago, General Manager
American Medical Response, Inc.

7255 N.W. 19 Street, Suite C, Miami, Florida 33126
Phone (305) 496-5072 Fax (305) 592-8640

Medics Ambulance Service, Inc.

January 20, 2012

Mr. Raul Gonzalez
Consumer Services Department
140 West Flagler Street, Suite 904
Miami, Fl 33130-1561

Re: Application for a Certificate of Public Convenience and Necessity

Dear Mr. Gonzalez;

We have received notice from your office that, Mr. Jack Mitchell of Advanced Ambulance Services, LLC has submitted an application for a Certificate of Public Convenience and Necessity (COPCN). We have reviewed this application and have found significant findings that strongly suggest rejection and denial of Advance Ambulance Services application. Due to the following reasons below, Medics Ambulance Service strongly opposes any award of a COPCN to Advanced Ambulance Services.

1. Mr. Jack Michel, nor anyone listed within the application has any experience in the management of an ambulance transportation business. Section 4-4. (a)(7) requires a minimum of five (5) years of experience by the majority owner or general manger.

2. In the applicants Statement of Determining need, the applicant has provided population data and projections to support the additional COPCN. As experts in the ambulance transportation field, it is our assessment that the need for non-emergency transportation will be decreasing in the years to come. A review of our own run data out of Larkin Hospital supports our own assertion with a decrease in non-emergency ambulance transportation.

3. Mr. Cardounel stated in his Statement of Determining Need that due to Larkin Community Hospitals growth, a COPCN should be awarded. It is our assessment that Medics Ambulance alone could manage any increase in non-emergency ambulance transports that Larkin Community Hospital may have.

4. No pro forma was provided with the application. The management team of Advanced Ambulance Services lacks any ambulance management experience. Advanced Ambulance Services should be at a minimum, required to provide a pro forma on its intended ambulance service.

Administrative Offices • 378 SW 12th Avenue • Deerfield Beach, Fl 33442 • Phone (954) 763-1776 • Fax (954) 943-8847

5. Advanced Ambulance Services has stated that it can improve the care provided to patients, however; it has failed to define how it will do so. No training manual was included in the application

It is our opinion that the application provided by Advanced Ambulance Services, LLC is incomplete and falls to meet the requirements that have been established by the Board of Commissioners of Miami Dade County. Additionally, we believe that Advanced Ambulance Services has failed to provide any evidence as to why an additional provider is needed. Medlos Ambulance Service strongly opposes the application of Advanced Ambulance Service or the issuance of any new COPCNs.

Sincerely,

Matthew Johnson
General Manager

MIAMI DADE
AMBULANCE SERVICE

January 17, 2012

RECEIVED
JAN 23 2012
Passenger Transportation
Regulatory Division

Mr. Raul Gonzalez
Ambulance Regulation Coordinator
Miami-Dade County
Sustainability, Planning, and Economic Enhancement
Consumer Services Division
140 West Flagler Street, Suite 904
Miami, Florida 33130-1561

Dear Mr. Gonzalez:

As you know, Miami-Dade Ambulance Service has been providing medical transport services in Miami-Dade County since 2001, and our family has successfully owned and operated transportation companies providing a myriad of passenger-based transportation services in this community for almost 40 years. As an industry leader in the transportation field in Miami-Dade County, Miami-Dade Ambulance Service is particularly proud to provide exceptional Advanced Life Support (ALS) and Basic Life Support (BLS) services to the County through the 43 permits that we currently operate, in addition to serving as a provider to the Miami-Dade's back-up 911 service. As an active and responsible ambulance provider, Miami-Dade Ambulance Service submits this letter in response to the Application for a Certificate of Public Convenience and Necessity (COPCN) submitted by Advanced Ambulance Services, LLC. In this regard, Miami-Dade Ambulance Service respectfully submits that after thoroughly reviewing the "Statement of Determining Need", there is simply no reasonable or rational need that would warrant the Board of County Commissioners to grant a COPCN to Advanced Ambulance Services, LLC, and therefore, we hereby formally object to the issuance of the COPCN for the reasons set forth herein.

Background

When assessing the need of additional ambulance certificates, it is imperative to begin the analysis by reviewing the number of private ambulance vehicles serving Miami-Dade County, and how the vehicles on the roads have dramatically increased despite a modest increase in the County's population:

- In the Year 2000, there were 79 active private ambulance vehicles, serving a population 2,253,485 in Miami-Dade County.

2766 NW 62nd Street • Miami, Florida 33147 Phone: 305-779-0505 • Fax: 305-779-0500

- In the Year 2010, there were 185 active private ambulance vehicles, serving a population 2,563,885 in Miami-Dade County.

Thus, while the population only increased by 310,400 residents in this past decade, the number of ambulance vehicles more than doubled, by a total of 106 units. In other words, whereas 79 vehicles served approximately 28,525 residents, the County now has 185 vehicles serving approximately 13,859 residents. It is important to note that these figures do not include the County's Fire Rescue vehicles, but only the vehicles of 6 ambulance providers.

Simply stated, as reflected in the aforementioned figures, since 2001, when the County Commission granted COPCN(s) to three (3) additional ambulance providers, the need for additional ambulance service at this time has not proven necessary. Indeed, empirical data in the public record, including but not limited to surveys from local hospitals, as well as documentation in the County's Consumer Services Division, supports the fact that there is no justifiable need to further augment the ambulance vehicles to the already vastly congested streets of Miami Dade. Further, from a public policy perspective, there has not been a demand in the form of complaints or otherwise suggesting that there is an identifiable need for additional ambulances.

Advanced Ambulance Services, LLC's Statement of Determining Need

Unlike Miami Children's Hospital, which Larkin Hospital attempts to mirror as a justification for approval of the COPCN, Larkin offers a multitude of medical services, which are no different from that of other hospitals in the County. Conversely, Miami Children's Hospital, which was granted a COPCN in 2009, largely transports specialized pediatric patients, which justifiably require the expertise of that specific hospital staff. Advanced Ambulance Services, LLC's Application does not distinguish such a specialized need that cannot currently be met by the existing ambulances providers in Miami-Dade. It must also be noted that Advanced Ambulance Services, LLC characterizes the types of services to be provided as "ambulatory", which is, of course, an industry term for the delivery non-medical services which could be simply obtained via a PMC permit, rather than the more regulated COPCN for medical ambulance services.

Conclusion

Section 4-4 of the Code of Miami-Dade County not only provides for stringent COPCN Application requirements, some of which are substantively lacking in Advanced Ambulance Services, LLC's Application, but also mandates that there be an actual need and necessity in Miami-Dade County for additional ambulances to be permitted. There is simply no such need at this time. Approval of this application would only result in further congestion throughout our streets, and specifically, in and around emergency and medical centers that may frustrate, and worse, adversely affect urgent medical transportation corridors. For the reasons set forth above, as well as the public policy provisions provided in the Code of Miami-Dade County – which

have not been satisfied in the Application at bar – Miami-Dade Ambulance Service respectfully urges the County to recognize the compelling health, safety, and consumer implications of this untimely and unsupportable Application, and deny the issuance of another COPCN.

Sincerely,

Ray Gonzalez
President & CEO
Miami Dade Ambulance Service

AMERICAN AMBULANCE

January 16, 2012

Mr. Raul Gonzalez, Ambulance Regulation Coordinator
Miami Dade County
Consumer Services Department
140 West Flagler Street, Suite 904
Miami, Florida 33130-1561

Dear Mr. Gonzalez:

American Ambulance Service is writing in response to Advanced Ambulance Services, LLC application for a Certificate of Public Convenience and Necessity (COPCN) in Miami Dade County. In reviewing the Statement of Determining Need there appears to be no need that would cause The Miami Dade County Board of County Commissioners to grant a COPCN to Advanced Ambulance Services, LLC. American Ambulance Service opposes the issuance of the COPCN for a number of reasons.

Since 2001 when the Miami Dade County Board of County Commissioners granted a COPCN to three additional ambulance services the need for additional ambulance service has not proven necessary. The Miami Dade County, Consumer Services Department through their surveys to local hospitals has not seen the need to add additional ambulance resources in Miami Dade County. The Consumer Services Department has not received complaints from Miami Dade County healthcare facilities concerning availability of private ambulance service that would lead to the need for additional ambulance resources.

Over the past twelve months and specifically effective December 21, 2011 changes in Medicare and Medicaid rules and regulations is forcing all healthcare entities to more closely examine if ambulance service is truly necessary to move patients between healthcare facilities. This is in contrast to years of utilization of ambulance transportation by healthcare facilities. The driving force behind this move is the healthcare reform program being propelled forward by the Federal Government. The Medicare Program is closely scrutinizing all medical transportation being performed by ambulance service. This scrutiny is designed to stop payments for ambulance transportation that the Medicare Program feels unnecessary. This forces healthcare providers such as hospitals and skilled nursing facilities to closely examine if a patient can travel by means other than ambulance.

As in every facet of healthcare, the Federal Government is forcing change to reduce healthcare costs to the federally funded Medicare program. There is an argument as to whether or not the change being forced by the Medicare Program as it relates to ambulance service is in the best interest of the patient. While the argument does exist the Federal Government has moved forward and forced these changes.

The fact is that there currently exist six ambulance services in Miami Dade County. Due to changes in the Medicare program there is less work for the existing services. The existing services employ hundreds of people in Miami Dade County and feed their families. It is in the best interest of Miami Dade County to keep the existing services financially healthy and not add additional ambulance resources to what is rapidly becoming a glutted market based on the resources of the existing ambulance providers and healthcare changes that have occurred.

The Statement of Determining Need Advanced Ambularice Services, LLC references the granting of a COPCN in 2009 to Miami Children's Hospital. Miami Children's Hospital already possessed a COPCN prior to requesting additional ambulances in 2009. The request for additional ambulances was not met with opposition by the ambulance community because it was recognized that the patients being transported by Miami Children's Hospital were pediatric and truly required the expertise of hospital staff.

In the application and Statement of Determining Need submitted by Advanced Ambulance Services, LLC nowhere does there appear to be a need that is not currently being met by the existing ambulance providers in Miami Dade County. We understand that Larkin Hospital offers a multitude of services however; the services offered are no different from that of other hospitals in Miami Dade County. The population growth while true has lent no additional need to existing ambulance resources currently available in Miami Dade County.

We also take note of the fact that three times in the Statement of Determining need, Advanced Ambulance Services, LLC utilizes the word "ambulatory" in a context where the word ambulance or emergency medical services (EMS) should be utilized. This leads us to wonder if the license they wish to apply for is a PMC permit to deliver non-medical services and not ambulance service.

In Closing there is no need and necessity in Miami Dade County at this time that would cause the Miami Dade County Board of County Commissioners to grant Advanced Ambulance Services, LLC a COPCN that would allow them to compete with the existing ambulance providers for all of the reasons stated above. We ask that the Board of County Commissioners review and understand the healthcare environment and surrounding factors that are currently impacting the ambulance providers in Miami Dade County before reaching a decision on issuing another COPCN.

Sincerely,

Raul Medina Jr.
President