



Memorandum



Miami-Dade County Office of the Inspector General
A State of Florida Commission on Law Enforcement Accredited Agency
601 NW 1st Court ♦ South Tower, 22nd Floor ♦ Miami, Florida 33136
Phone: (305) 375-1946 ♦ Fax: (305) 579-2656
Visit our website at: www.miamidadeig.org

To: William J. Heffernan, Chairman
and Members, Public Health Trust, Miami-Dade County

Carlos A. Migoya, President and CEO, Jackson Health System

From: Felix Jimenez, Inspector General 

Date: November 5, 2020

Subject: OIG Final Report – Review of Jackson Health System Payments to Trinity Air Ambulance International, LLC, for Inbound Patient Transports; IG18-0005-O

Attached please find the above-captioned final report issued by the Office of the Inspector General (OIG). This review was originally predicated on information received by the OIG from Trinity Air Ambulance International, LLC (Trinity), a Jackson Health System (JHS) vendor of air ambulance services. Trinity, a provider of organ air transport and outbound air ambulance services, alleged that JHS was demanding reimbursement of \$303,635 for air transports of patients admitted into JHS. Trinity asserted that the air transport arrangement was agreed to by JHS officials and Trinity had no intention to return the payments. Because such a venture could be violative of federal law under the purview of the Department of Health and Human Services Office of the Inspector General (HHS-OIG), we determined that a closer examination was warranted. Our investigation concluded that Trinity's initiative to transport patients into JHS and bill the Air Ambulance contract was done with the knowledge and acquiescence of two JHS Vice Presidents. We also found that the invoices submitted by Trinity for the inbound flights of patients referred to JHS facilities were knowingly approved for payment.

This report as a draft was provided to JHS Executives Carlos A. Migoya, Alejandro Contreras, Rosa Costanzo, Ernest Verdecia, Fidel Alvarez, Judy Ringholz, and Mark T. Knight for review and an opportunity to provide a written response. The draft report was also provided to Inger Lisa Skroder of Trinity. We did not receive a response from Ms. Skroder.

Several weeks prior to the onset of the pandemic, we received a single response on behalf of JHS (Attached as Appendix B to the Final Report). Responding for JHS, Ms. Ringholz stated that self-disclosure of this matter to HHS-OIG "is not warranted, nor would it be appropriate." That conclusion was based upon an assessment of the OIG report by the law firm of Hooper, Lundy & Bookman, P.C. (HLB). We requested and

received a 33-page memorandum authored by HLB and relied upon by JHS for its position (Attached as Appendix C to the Final Report).

While it is clearly the right of the PHT to engage a law firm to provide advice, the OIG is compelled to identify many of the errors and omissions contained in the HLB Memorandum. The Final Report Section X discusses the principal errors and omissions the OIG believes should give JHS pause in accepting HLB's recommendation. While HLB based its conclusion that self-disclosure was not warranted based on its understanding of the facts, the OIG's comprehensive investigation based on sworn testimony and analysis of records supports a different conclusion.

The issuance of this Final Report has been delayed because of the COVID-19 pandemic. Our preference had been to defer the issuance and publication of the Final Report until this global health crisis passed, but we are now adjusting to a new normal and, as such, cannot further delay issuance of this Final Report.

In accordance with Section 2-1076 of the Code of Miami-Dade County, the OIG will share this Final Report with HHS-OIG within 30 days of its issuance.

For your reading convenience, an Executive Summary is attached to this transmittal.

Attachment

cc: Don S. Steigman, Executive Vice President and Chief Operating Officer, JHS
Mark T. Knight, Executive Vice President and Chief Financial Officer, JHS
Judy Ringholz, Chief Compliance Officer, JHS
Alejandro Contreras, Senior Vice President and Chief Administrative Officer, JHS
Rosa Costanzo, Vice President and Chief Procurement Officer, JHS
Eugene Shy, Jr., Assistant County Attorney
Ms. Inger Lisa Skroder, President and CEO, Trinity Air Ambulance Int'l, LLC (under separate cover)

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Review of Jackson Health System Payments to
Trinity Air Ambulance International, LLC, for Inbound Patient Transports

The Miami-Dade County Office of the Inspector General (OIG) conducted a review of Jackson Health System (JHS) payments to Trinity Air Ambulance International, LLC (Trinity), for inbound air ambulance transportation. In 2016, Trinity was the primary vendor on a contract to provide Air Ambulance Services (“Air Ambulance contract”) for the transport of JHS patients. The OIG learned from Trinity’s principals that they believed they had reached an agreement with JHS in 2016 to refer and transport their client-patients *into* JHS facilities and receive payment under its existing Air Ambulance contract. Trinity shared with the OIG an official letter sent by JHS demanding Trinity reimburse JHS a total of \$303,635.29 for patients transported into JHS facilities.

Generally, federal law prohibits the offering, solicitation, or acceptance of any type of payment in exchange for referrals of patients with federal healthcare benefits such as Medicare. Such agreements can be violations of the Civil Monetary Penalty and the Anti-Kickback provisions found in Sections 1128A(a)(5), 1128(a)(7), 1128(b)(7), and 1128B(b) of the Social Security Act, and 42 U.S.C. §§1320a-7b(b)(1)and(2).

When the OIG learned of the reimbursement demand and of OCE’s involvement reviewing this matter, we requested from OCE copies of any close-out memoranda, investigative reports, etc. documenting the investigation/review that took place. Due to changes within the OCE that occurred in 2016, the OIG was advised there was a dearth of documentation from the original investigation. At a meeting in August 2017 with JHS executives, including representatives of OCE and the County Attorney’s Office, the OIG was unexpectedly advised of the findings of a second OCE investigation. In short, OCE found that JHS did pay Trinity for inbound patient transports, which could run afoul of federal healthcare laws, but concluded that there was “no intent” by JHS to induce referrals. Further supporting its conclusion that there was no reportable wrongdoing, OCE determined that the payments were made by mistake. The OIG was provided with a copy of OCE’s final report and other gathered documentation in this matter.

Also discussed at that meeting was the status of JHS’s demand to Trinity that it reimburse the public health system. It was widely acknowledged by all parties present that it was very unlikely that Trinity would reimburse JHS and, as such, JHS had in fact paid for the transportation of patients into its hospital system. In the months following the meeting, the OIG learned that in September 2017, JHS refunded \$641,234.06 in fees for care billed to federal payors for those patients transported to JHS by Trinity. As a result of this venture, the loss to JHS was almost \$1 million.

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Based on our review of the documentation supplied by OCE, which contradicted other evidence preliminarily gathered by the OIG, we felt that further independent review was warranted.

The OIG requested, obtained, and reviewed extensive email correspondences between the parties (JHS and Trinity), as well as email exchanges between and among JHS staff. Much of the JHS internal email correspondence had not been included in the supporting documentation OCE initially provided to the OIG, and thus were likely not analyzed by OCE in reaching its conclusion of “no intent.” These internal email exchanges showed a completely different picture—a very intentional one—in how the 19 invoices were paid. In other words, it was clearly not by mistake. The OIG took sworn statements of JHS and Trinity officials to establish the details of the meetings and discussions that resulted in the inbound transport of patients. The OIG also reviewed the payment and approval process at JHS. The OIG’s independent review resulted in two findings:

Finding 1: Trinity’s initiative to transport patients into JHS and bill the Air Ambulance contract was done with the knowledge and acquiescence of two JHS Vice Presidents.

Finding 2: The invoices submitted by Trinity for the inbound flights of patients referred to JHS facilities were knowingly approved for payment.

The genesis of the arrangement was initiated by Trinity when it learned that the secondary vendor on the Air Ambulance contract (AeroJet International, Inc. d/b/a REVA, Inc.) had been paid by JHS for an inbound transfer of a patient. Trinity questioned why the transport was not given to it (as the primary vendor), but moreover, Trinity began exploring opportunities to fly in more patients to JHS and thus receive additional payments under its Air Ambulance contract.

The OIG found evidence of meetings and discussions that resulted in the inbound transport of patients, and the knowledge and acquiescence of JHS officials to that vendor initiative. Contemporaneous emails sent by Trinity outlined the proposals to JHS. On February 18, 2016, Trinity emailed the proposal to Alex Contreras, Senior Vice President and Chief Administrative Officer of JHS, who had participated in two earlier meetings with Trinity on this initiative. While there was no reply to this particular email and while Mr. Contreras stated that he did not open the email until after the impropriety of the venture had come to light, the OIG’s review of email communications on this subject shows that its contents—the proposed transportation agreement—was referenced repeatedly and specifically attached to one email. Based on these other communications and other evidence obtained, our review determined that this vendor-initiated program was

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launched with the knowledge and acquiescence of two JHS executives. The intent of the arrangement was to bring patients to JHS and not lose them to competing hospitals.

The OIG's review of the payments to Trinity determined that Mr. Contreras's approval of the invoices (19 of them) was not made "by mistake" as the OCE's internal investigation concluded. The OIG learned that at the time when Trinity's inbound Air Ambulance invoices were submitted for payment, Mr. Contreras was not a designated approver in the Lawson accounts payable system as an authorized approver of Transportation Department invoices. The Transportation Director had approved one invoice and began to question the approval of the remaining invoices. Shortly after Trinity started inquiring about the payment status of its invoices, Mr. Contreras was added as an authorized approver for Transportation Department invoices.

The OIG reviewed records of all approvals by Mr. Contreras. Although Mr. Contreras gave different statements to the OCE and OIG, both statements were similar in his assertion that the first invoice was not an inbound invoice and he approved the rest without checking them. Notably, each of the invoices approved by Mr. Contreras were docketed separately in the system, in other words, he had to approve each invoice individually—they were not batched for approval. More importantly, all the invoices were for inbound transportation of patients by Trinity. There was not one outbound transportation invoice that could, as Mr. Contreras alleged, result in the mistaken approval of the remaining invoices.

The OIG found that by the time Mr. Contreras received the invoices to approve, he had been a party to numerous emails pertaining to inbound patient flights that referenced meetings he attended. He was also copied on all the Air Ambulance invoices being sent by email from Trinity. Mr. Contreras approved the invoices despite questions raised by the Transportation Director and other JHS personnel regarding the invoices. Moreover, the OIG found an email between Mr. Contreras and the Chief Procurement Officer that clearly reveals that the intended purpose of such an arrangement with Trinity—to transport patients into JHS—was in order to maintain a competitive advantage over other regional hospitals. Finally, the OIG found that extraordinary steps were taken to expedite the actual payment to Trinity once the invoices were approved. As a result of this venture, JHS refunded a total of \$641,234.06 in fees billed to federal payors, and never received a reimbursement of the payments made to Trinity. In total, the loss to JHS was almost \$1 million.

Based on our independent review of the evidence, the OIG reached a different conclusion from that of OCE. The OIG's report was issued, as a draft, to JHS executives. The draft report contained three recommendations, as set forth below.

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1. JHS and OCE reconsider disclosing the Trinity proposal, inbound transports, and payments to the U.S. Health and Human Services, Office of Inspector General (HHS-OIG).
2. JHS provide and document training to JHS staff, including senior management and department directors, on the Anti-kickback Statute, the Civil Monetary Penalties Law, and other federal regulations to ensure compliance with legal requirements.
3. Establish a procedure to ensure that vendor initiatives and proposals are vetted, and due diligence, such as communicating with user departmental directors to determine any potential issues or pitfalls, is conducted prior to acting on such proposals.

JHS, in its response to the draft report, advised it was taking steps to implement processes and procedures in line with OIG Recommendation Nos. 2 and 3. Regarding the OIG's first recommendation, that JHS consider self-disclosure of this matter to HHS-OIG, the JHS response states that self-disclosure "is not warranted, nor would it be appropriate." That conclusion was based upon an assessment of the OIG Draft Report by the law firm of Hooper, Lundy & Bookman, P.C. (HLB), (See Appendix B to the Final Report for JHS's written response).

The OIG requested and received HLB's 33-page memorandum detailing its review and opinion (Attached to the Final Report as Appendix C). The OIG's Final Report contains a rebuttal that addresses the most critical lapses in HLB's memorandum.

Interestingly, HLB's interview of Mr. Contreras elicited additional facts that support the OIG's recommendation that this matter should be self-disclosed to the HHS-OIG. HLB writes that "Mr. Contreras said that he 'clearly knew' that 'what they were referring to was something that we couldn't do as a health system. We couldn't pay someone to bring us patients'" (HLB memo p. 9). HLB's interview of Mr. Contreras also discloses that he [Contreras] could potentially benefit financially from the arrangement with Trinity by increasing revenues to JHS. Those two facts—that Mr. Contreras had knowledge of the impropriety of the venture and that he had could benefit financially—are sufficient to call into question HLB's opinion that self-disclosure is not necessary.

HLB is also misguided when it concludes there was no agreement between the parties because Trinity's contract was not amended. HLB conflates not amending the contract with not accepting the proposal. HLB also overlooks a key fact contained in the OIG

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report—the contract did not need to be amended because it allowed transports “from and to” JHS facilities. The JHS Chief Procurement Officer confirmed, after the payments were made, that the “from and to” language was contained in the original request for proposals and incorporated by reference in the awarded contract. The Chief Procurement Officer and Mr. Contreras were the parties on the email exchange that showed the motivation behind the inbound arrangement made with Trinity: “...we need to move quickly to have the patients come here instead of our competition. We turn them away and Broward and Baptist pick them up quickly.”

HLB, like OCE, erroneously found that invoices were paid by mistake. HLB fails to consider important facts and conflates the need for payment of the Organ Air Transport invoices with the payment of the Air Ambulance invoices. (Trinity was the secondary vendor on the Organ Air contract, at the same time it was the primary vendor on the Air Ambulance contract.) HLB’s analysis leaves out contemporaneous emails and other evidence that make clear that the two sets of invoices were separate matters sent to separate approvers.

Equally, if not more troubling than HLB’s exclusion of facts from its analysis, is HLB’s acknowledgement that there are discrepancies between Mr. Contreras’s statements and the evidence. HLB writes that it “... cannot reconcile some of Mr. Contreras’ statements made regarding these events with the evidence” (HLB memo p.3). Yet despite these acknowledged discrepancies, HLB concludes that there was no agreement between JHS officials and Trinity, and that the payments were made by mistake. HLB opines that self-disclosure is not warranted.

There are many other errors of fact and analysis throughout the HLB memorandum. The OIG’s rebuttal only highlights the principal errors that the OIG believes should give JHS pause in accepting HLB’s opinion. The decision to self-disclose to the HHS-OIG, warrants full consideration of clear and complete facts as presented in this OIG Final Report.

MIAMI-DADE COUNTY

OFFICE OF THE INSPECTOR GENERAL



FINAL REPORT

IG18-0005-O

***Review of Jackson Health System Payments to
Trinity Air Ambulance International, LLC,
for Inbound Patient Transports***

November 5, 2020

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Attachments to the Final Report

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I. INTRODUCTION

As part of the Miami-Dade County Office of the Inspector General's (OIG's) ongoing oversight of the Public Health Trust (PHT) and the operational activities of Jackson Health System (JHS), the OIG began a review into JHS payments to Trinity Air Ambulance International, LLC (Trinity), for inbound air ambulance transportation. Paying for inbound patient air transportation is a possible violation of federal laws, specifically the Civil Monetary Penalty and the Anti-Kickback provisions found in, Sections 1128A(a)(5), 1128(a)(7), 1128(b)(7), and 1128B(b) of the Social Security Act, and 42 U.S.C. §§1320a-7b(b)(1) and (2). Generally, federal law prohibits the offering, solicitation, or acceptance of any type of payment in exchange for referrals of patients with federal healthcare benefits such as Medicare.

In 2017, Trinity had two contracts with JHS. Trinity was the primary vendor on Contract No. PHT RFP-13-11355-CS to provide Air Ambulance Services ("Air Ambulance contract") for the transport of patients. Trinity was also the secondary provider on the Organ Air Transport Services contract ("Organ Transport contract") Contract No. PHT RFP-13-11362-MAM. That contract provides transport of surgical teams and/or organs for the JHS Miami Transplant Institute.

The OIG learned from Trinity that in 2016, Trinity principals believed they had reached an agreement with JHS to refer and transport their client-patients *into* JHS facilities and receive payment under its existing Air Ambulance contract.¹ According to Trinity, JHS was demanding Trinity return the payments that had been invoiced and paid pursuant to the agreement. The OIG learned from JHS that due to the potential violations of law, the JHS Office of Compliance and Ethics (OCE) reviewed the JHS payments made to Trinity. The OCE conducted two internal investigations of the matter and concluded that key JHS officials had "no intent" to induce referrals, found "no wrongdoing on the part of JHS", and determined that payments were made by mistake.

The OIG conducted an independent review resulting in two findings. As detailed in the sections that follow, the first finding relates to the vendor initiative to transport patients into JHS, and the subsequent invoicing and payments from the Air Ambulance contract between Trinity and JHS. Finding 2 discusses the payment authorization and the steps

¹ The air ambulance contract had been primarily used to transport patients out of JHS and into care facilities in the patient's country or community of origin. As is explained in this report, although the contract contained language that specified transports "from and to" different locations, what preceded Trinity's offer to refer inbound patients and bill the under the contract, was the discovery of a payment by JHS to the secondary vendor for an inbound patient transport. It does not appear from the investigation, that the parties were relying on the contract language. In fact, as will be noted later in the report, it is not until after JHS's Chief Operating Officer questioned the inbound flights that the contract language was examined. Of note, the "from and to" language does not appear in the subsequent, current, JHS Air Ambulance contract.

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taken to process the payments to Trinity. In reaching the OIG's conclusions it became evident that the investigation conducted by the Office of Compliance and Ethics was incomplete and its conclusions were erroneous. The OIG's review determined that JHS and Trinity did come to a mutual understanding regarding the transportation of patients and that the resulting payments were not, as the OCE concluded, a mistake.

Senior administrators of this publicly supported hospital are all expected to be keenly aware of the prohibition on financial inducements for patient referrals. Yet, as this report details, hundreds of thousands of dollars were paid to an air ambulance company for referring and transporting patients into JHS hospitals, including patients whose services were reimbursed by a federal health care program. The resulting reimbursement for the care services rendered to those federally insured patients also cost JHS several hundreds of thousands more.

II. OIG JURISDICTIONAL AUTHORITY

In accordance with Section 2-1076 of the Code of Miami-Dade County, the Inspector General has the authority to make investigations of County affairs; audit, inspect and review past, present and proposed County and Public Health Trust programs, accounts, records, contracts and transactions; conduct reviews, audits, inspections, and investigations of County and Public Health Trust departments, offices, agencies, and Boards; and require reports from County and Public Health Trust officials and employees, including the Mayor, regarding any matter within the jurisdiction of the Inspector General.

III. RELEVANT GOVERNING AUTHORITIES

This report involves the following legal authorities, as summarized below:

The Anti-Kickback Statute, 42 U.S.C. §1320a-7b(b) - prohibits the knowing and willful offer, solicitation, receipt or payment of any remuneration in return for or in exchange for the referrals of services or items reimbursable by a Federal health care program. Remuneration includes the transfer of anything of value and can be direct or indirect. In essence, the law prohibits medical providers such as JHS from paying in exchange for referrals of patients whose treatment will be paid for by a government healthcare program such as Medicare.

Civil Monetary Penalty Law (CMP) - 42 U.S.C. §1320a-7a and §1128A (a) (5) of the Social Security Act (SSA) - provide for the imposition of monetary penalties and the potential for program exclusion of a provider for conduct described in the Anti-Kickback Statute.

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Department of Health and Human Services Office of the Inspector General (HHS OIG) Advisory Opinion No. 07-02 – The opinion was issued in response to a request by a hospital seeking to subsidize the cost of ambulance transportation for patients transported into the hospital from outside the hospital's local area. The HHS OIG's legal analysis and opinion stated that paying for inbound patient transportation could result in a violation of the anti-kickback statute which makes it *"a criminal offense to knowingly and willfully offering, paying solicit, or receiving any remuneration to induce or reward referrals of items or services reimbursable by a Federal health care program."* The opinion also found a potential violation of the CMP statues. The HHS OIG reasoned that "the payment or subsidy of an expense that would ordinarily be borne by a patient constitutes remuneration to the patient" and the proposed services "may influence the initial and subsequent choice of the Hospital for hospital services"; the arrangement "is likely to influence patients to order or receive items or services reimbursable by Medicare or Medicaid."

IV. BACKGROUND

JHS is governed by a seven-member appointed Board of Trustees known as the PHT. JHS has been serving the people of Miami-Dade County for over 100 years. JHS operates six hospitals, two skilled nursing homes, several primary care centers, as well as multiple specialty care centers. One of the specialty care centers operated by JHS is the Miami Transplant Institute (MTI).

MTI is the only center in South Florida that performs every type of organ transplant. There are more than 450 transplant procedures performed at MTI each year. In support of MTI, there are contract aircraft available 24 hours a day, 365 days a year, to fly surgical teams to retrieve donated organs. Trinity was the secondary vendor for the organ transport contract. JHS recently concluded a competitive bid process to select a charter jet service provider to transport these surgical teams and/or organs.

JHS serves a metropolitan area that is a domestic and international tourist destination and a crossroads for global business. As a level one trauma facility, JHS treats a high volume of emergency care patients, regardless of their ability to pay. Due to its unique geographical location, level one trauma expertise, specialty care services, and the reputation of its physicians and staff, JHS is the preferred care provider of patients near and far.

As a premier healthcare facility in South Florida, there are patients throughout the Caribbean, Central and South America that seek medical attention at JHS. Air ambulance providers routinely transport patients into South Florida for care at JHS facilities. For these incoming patients, JHS operates an International Division that provides specialized concierge services to assist these traveling patients.

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The International Division of JHS routinely communicates with air ambulance services to ensure accepting physicians have granted medical clearance. The staff also performs due diligence to obtain financial clearance for the patients by verifying insurance coverage or establishing credit prior to admitting patients to JHS. The International Division *does not* review business/payment arrangements made between the air ambulance provider and the patient, as the hospital is not a party to the air transportation services agreement.

As part of its public hospital mission, JHS often provides care for visitors who are injured or become ill during their stay in our community. When it is in the mutual best interest of the patient and the hospital, JHS occasionally transports patients from JHS to another facility or repatriates the patient to a facility in his/her country of origin. In these cases, JHS will arrange—and pay—for transport, which may include air ambulance services. On April 16, 2014, JHS executed contracts for air ambulance services to a primary vendor, Trinity, and a secondary vendor AeroJet International, Inc. d/b/a REVA, Inc. (REVA).

V. THE OFFICE OF COMPLIANCE & ETHICS

Between January 28, 2016 and March 29, 2016, Trinity transported 21 patients to JHS. In March and April of 2016, Trinity invoiced JHS for those 21 inbound transports, plus an additional patient transported in October 2015, under its air ambulance contract.² On April 13, 2017, 19 of the 22 invoices were processed for payment by JHS. Shortly thereafter, at the request of JHS's Chief Operating Officer, Mr. Don Steigman, the OCE was asked to investigate the payments as there were potential violations of law.

The OCE at JHS operates under a Compliance and Ethics Program Charter adopted by the Public Health Trust.³ The OCE is guided by the HHS OIG "Supplemental Compliance Program Guidance for Hospitals,"⁴ and strives to fulfill the federal mandate of the Affordable Care Act⁵ that the hospital maintain an effective Compliance and Ethics program.

The OCE provides critical support to the institution on matters of compliance, primarily from a preventative posture. It is the responsibility of the OCE to promote compliance with "the (1) False Claims Act, (2) the Anti-Kickback Statute, (3) the Civil Monetary Penalties Law, (4) the Exclusion Statute, (5) the Stark Law, and (6) HIPAA."⁶

² The OIG did not investigate the circumstances of that isolated 2015 inbound transport.

³ Jackson Health System's Compliance and Ethics Program Charter. September 2018.

⁴ Federal Register / Vol. 70, No.19 / Monday, January 31, 2005.

⁵ Patient Protection and Affordable Care Act of 2010.

⁶ JHS Compliance and Ethics Program Charter. September 2018.

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The OCE staff interviewed multiple parties with knowledge of the Trinity transactions. As a result of that initial internal investigation of the incident, there was a meeting arranged between Trinity and JHS officials on June 10, 2016. Subsequent to the meeting, two demand letters were issued (October 11, 2016 and January 13, 2017) (**Exhibit 1**) seeking reimbursement from Trinity for the inappropriate payments. Trinity ignored the demand letters.

VI. OIG INVOLVEMENT RESULTING IN AN INDEPENDENT REVIEW

The OIG first learned of this matter from Trinity on April 20, 2017, during an inquiry into the administration of a JHS contract for Organ Air Transport Services. Trinity shared with the OIG an official letter sent by JHS demanding Trinity reimburse JHS a total of \$303,635.29 for patients transported into JHS facilities. Trinity principals were insistent that the payments had been invoiced for services rendered pursuant to their Air Ambulance contract, PHT RFP-13-11355-CS, and advised the OIG they had not, and would not, respond to the reimbursement request from JHS.

On May 26, 2017, the OIG met with Ms. Judy Ringholz, Vice President and Chief Compliance Officer of the Office of Compliance and Ethics (OCE). Ms. Ringholz confirmed repeated written requests had been sent to Trinity seeking reimbursement for the payments that were deemed inappropriate by JHS. Specifically, JHS sought the payments made on April 13, 2016, for patients transported to JHS by Trinity.

Ms. Ringholz explained that an OCE internal investigation, conducted between April and June of 2016 (prior to her employment with JHS⁷), confirmed that JHS paid Trinity for inbound patient transports, which could run afoul of federal healthcare laws. After OCE found no wrongdoing on the part of JHS, it was determined the payments should not have been made and, thus, reimbursement should be sought from Trinity. (In seeking reimbursement, JHS directed Trinity to recoup its transport fee from the patient and/or the patient's insurance.

During that meeting, the OIG requested copies of any close-out memoranda, investigative reports, etc. demonstrating the investigation/review that took place. Due to several personnel changes within the leadership of the OCE that occurred in 2016, the OIG was advised there was a dearth of documentation from the original investigation. Ms. Ringholz then initiated a second internal investigation in the summer of 2017.⁸

⁷ Ms. Ringholz had not assumed her position with OCE until late 2016. The internal investigation was led by Ms. Cheryl Wagonhurst, an interim steward and consultant to JHS. Ms. Wagonhurst, who now resides in California, was hired as a consultant for the second OCE investigation and was compensated approximately \$20,000 for her services.

⁸ Prior to the second investigation, the OCE had requested a JHS internal audit of the secondary air ambulance services provider, REVA. The JHS Internal Audit Memorandum noted that the OCE had already "performed an analysis related to patient air ambulance transportation cost and...[t]he OCE concluded that

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At the request of the OIG, on August 18, 2017, there was a meeting with the OCE to discuss JHS's policies pertaining to air transportation services.⁹ At that meeting, the OIG was unexpectedly advised of the findings of a second OCE investigation and provided a copy of OCE's final report in this matter. **(Exhibit 2)** Among the attendees at the meeting, was Ms. Cheryl Wagonhurst, a JHS consultant who had been involved with the first investigation as the interim steward of OCE.

Ms. Ringholz and Ms. Wagonhurst discussed the review process and announced the results of their second investigation: "...there was no wrongdoing on the part of JHS." Specifically, the OCE listed the following facts in its closing memorandum:

- *In early 2016, a misunderstanding between the parties resulted in Trinity acting on an arrangement they had proposed, with the expectation that they would be paid for inbound transports, while JHS was not aware that Trinity was acting on a proposal that it had not accepted.*
- *In March and April of 2016, Trinity sent...invoices to JHS for the transports they performed On April 13, 2016, JHS paid nineteen (19) of those invoices. The JHS leader who approved the payment explained that he only reviewed the first invoice, which was not for an inbound patient, and he approved all invoices in the batch.*
- *When it was brought to his attention that he had approved payments on invoices that were for transports of inbound patients, he reached out to the CFO at JMH and others in Finance in an effort to stop the payment before a check was processed, but he learned the payment had been made by credit card (P-card).*

In support of its conclusion that "...there was no wrongdoing on the part of JHS," the OCE determined that:

- there was an absence of any intent by the parties to generate additional business and no evidence that JHS accepted Trinity's proposal
- payment for 19 inbound patients was made by mistake

The OIG was provided a file with the close-out memorandum and documentation that purportedly supported the OCE conclusion. The file was carefully reviewed by the OIG. Following the review of the materials provided, the OIG had concerns about the OCE

it was inappropriate for a hospital to pay air ambulance companies for inbound air ambulance transportation."

⁹ The OIG requested the meeting in part because we wanted to understand the impact of the outstanding demand letter on the selection process for the new Organ Air contract.

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conclusion. The OIG met with the OCE several times to discuss specific information gaps in the files of their Trinity payment investigations. Following the discussions with the OCE the OIG conducted its own detailed review.

In the latter part of 2017, JHS was engaged in a competitive process for the award of a new contract for Organ Air Transportation Services, a bid being pursued by Trinity. The OIG refrained from seeking further evidence about the inbound patients to not jeopardize the integrity of the pending procurement. As the procurement process reached its conclusion, beginning in May of 2018, the OIG renewed its review of the payments made to Trinity for steering its client-patients into JHS facilities.

The OIG sought additional documentation and conducted a series of sworn interviews of JHS officials. In addition to interviewing JHS staff previously interviewed by the OCE, the OIG interviewed several personnel from the Accounts Payable, Information Technology, Procurement, Transportation and International Departments. Representatives of Trinity were also interviewed, and Trinity's records were requested and reviewed.

The administration of JHS has been cooperative in providing all requested documentation, including electronic communications among the parties involved. The OIG has reviewed numerous emails between the parties contemporaneous with the events resulting in the transports, the invoice requests, and the payment of the invoices. Throughout the report, references will be made to the interviews and the emails reviewed. *Excerpts* of emails are highlighted in table format with the date, time, and parties referenced; the complete emails are attached in chronological order as Appendix A.¹⁰ Finally, the OIG has reviewed the payment and approval process at JHS and assembled evidence that challenges the conclusions reached by the OCE.

VII. OIG REVIEW

The OIG review resulted in two findings. Our review first focused on the events that resulted in Trinity's perceived agreement to transport patients and bill under its Air Ambulance contract. Finding 1 details the meetings and discussions that resulted in the inbound transport of patients, and the knowledge and acquiescence of two JHS officials to that vendor initiative. Finding 2 examines the JHS approval process for the payments that were made. In reviewing the payments, it became apparent that the JHS executive who approved the bulk of the invoices failed to heed the repeated concerns raised by subordinate department managers. Moreover, extraordinary steps were taken to expedite the payments to Trinity once the invoices were approved. Contrary to the OCE's recitation of events, there were no efforts to stop the payments until the Chief Operating Officer of JHS was alerted to the improprieties. The OIG believes lapses in the OCE investigation, discussed throughout, resulted in the OCE's erroneous conclusions.

¹⁰ Some information in the Appendix has been redacted in accordance with 42 U.S.C. §1320d et.seq.

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Finding 1 Trinity's initiative to transport patients into JHS and bill the Air Ambulance contract was done with the knowledge and acquiescence of two JHS Vice Presidents.

In early 2016, several senior JHS executives engaged with the principals of Trinity to explore business opportunities to increase patient traffic into JHS facilities. The origins of this business relationship can be traced to an inbound flight assigned to REVA, the secondary vendor on the air ambulance contract.¹¹ The OIG interviewed Trinity principals who stated that they gathered information through public records requests about the payments JHS made to REVA for the inbound flight of a Medicaid patient from Tallahassee transported on December 30, 2015. In emails reviewed by the OIG, it is apparent that Trinity was persistent in arguing that JHS had been wrong to assign this flight to the secondary vendor.

Trinity had been the vendor first contacted by JHS officials regarding the transport of the Medicaid patient from Tallahassee. Upon being contacted by JHS, Trinity spoke with a representative of Medicaid and was advised that approval could not be granted until the following business day. Trinity advised JHS that its aircraft was available to transport that night if a credit card was available to pay for the flight. The JHS Director of Transportation, Mr. Ernest Verdecia was interviewed by the OIG and recalled the incident. Mr. Verdecia recalled being put off by the suggestion that JHS provide a credit card for payment.¹² The next morning, REVA, the secondary vendor under the air ambulance contract, was assigned the flight.

Trinity later learned that payment to transport this Medicaid patient from Tallahassee was not from Medicaid. JHS had guaranteed the payment to REVA, relying upon the fee schedule in the existing air ambulance contract. This was the first time, according to Trinity, they learned that an inbound flight could be paid under the terms of the existing contract with JHS.¹³ Trinity's President and Chief Executive Officer, Ms. Inger Lisa Skroder, sent an email to the Vice President and Chief Procurement Officer of JHS, Ms. Rosa Costanzo, asking:

¹¹ Payment for the inbound REVA flight was the subject of a JHS Internal Audit report initiated at the request of the OCE. The inappropriate payment was noted in the JHS Internal Auditor's Reportable Observation #4. The OIG did not investigate the payment to REVA.

¹² Trinity disputes requesting a credit card from JHS. "...[O]ur email...states that 'if we have a secured payment, via credit card from the family'. Trinity never asked for credit card from Jackson."

¹³ Trinity's conclusion that payment could be made through the Air Ambulance contract is erroneous. Such a payment would be contrary to the federal Anti-Kickback provisions.

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January 5, 2016, 9:43 a.m.
From: Inger Lisa Skroder To: Rosa Costanzo

Why was this information that Jackson will guarantee payment for this transport never disclosed to Trinity?

Trinity summarized the contract activity to that point:

January 5, 2016, 9:43 a.m.
From: Inger Lisa Skroder To: Rosa Costanzo.

Our contract commenced April 15, 2014 and it was projected that there would be total of \$1,018,571.00 billed to Jackson under Purchase Order 8108421-O-SERV. To date it has been 21 months since inception of the contract and we have had only FIVE transport requests and the total billed to Jackson is \$76,899.16. After this case and experience, I can only assume that the balance of the air ambulance trips are being diverted to REVA!

The email refutes the OCE's factual finding that "[l]ow utilization of the services during the first twenty-one months that the agreement was in effect is consistent with the absence of any intent by the parties to generate additional business." In fact, the low utilization is evidence of Trinity's motivation to propose the inbound flights initiative.

Following Trinity's discovery of the REVA payment for inbound transport Trinity campaigned to assert its primary vendor status with JHS officials and explored opportunities to get payments for inbound patient transports under the air ambulance contract. Ms. Skroder discussed some ideas during a phone conversation with Ms. Costanzo and followed up the discussion with an email about an air ambulance program managed by the Cleveland Clinic in neighboring Broward County. On January 7, 2016, two days after inquiring about the use of the contract for the REVA inbound transport, Ms. Skroder notes that a collaborative air ambulance partnership with JHS would bring more clients to JHS:

January 7, 2016, 5:34 p.m.
From: Inger Lisa Skroder To: Rosa Costanzo

I know that we (JHS & Trinity) would be able bring more clients directly to the Jackson Health System. JHS has FULL capabilities to manage any patient, unlike the CC. Let me know if you would like to discuss further the possibilities.

Ms. Costanzo advised the OIG that it is her standard practice as a procurement professional to entertain input from vendors seeking to maximize the utility of their services. When vendors have innovative proposals, Ms. Costanzo arranges meetings

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with user departments to give the vendor an opportunity to present their ideas. In this instance, Ms. Costanzo readily recalled facilitating a meeting between Trinity and Mr. Alejandro Contreras, Senior Vice President and Chief Administrative Officer of JHS, the administrator responsible for Transportation, the user department that had direct oversight of the air ambulance contract.

Indeed, Ms. Costanzo forwarded the above-referenced email from Ms. Skroder to Mr. Contreras within 24 minutes of receiving it:

January 7, 2016, 5:58 p.m. Forwarded From: Rosa Costanzo To: Alejandro Contreras
<i>Alex, Our existing primary air ambulance vendor under RFP 13-11355-CS, Trinity, has brought this information to my attention. It may be worthwhile to meet with them. If you would like me to schedule a meeting please let me know.</i>

Two minutes later Mr. Contreras, with an added “cc” to Mr. Verdecia, Director of Transportation, responded:

January 7, 2016, 6:00 p.m. Forwarded From: Alejandro Contreras To: Rosa Costanzo cc: Ernest Verdecia
<i>Yes we need to. Can you please</i>

On January 21, 2016, a meeting between Trinity and Mr. Contreras took place in an executive conference room at Jackson Main, Room WW126A. Present at the meeting were Ms. Costanzo and Mr. Contreras from JHS and Ms. Inger Lisa Skroder and Ms. Georgina Skroder from Trinity. The Director of Transportation, Mr. Verdecia, was not present. Following the meeting there were ongoing communications between the parties.

On January 27, 2016, Ms. Skroder sent an email to Ms. Costanzo and went as far as to suggest a partnership venture with Trinity managing a “*Jackson Health System 24/7/365 Air Ambulance Transportation Call Center.*”¹⁴

January 27, 2016, 1:17 p.m. From: Inger Lisa Skroder To: Rosa Costanzo
<i>Thank you for setting up the meeting with your colleagues at JHS last week. Further to our meeting, I have put together the following list of how this venture would work. Take a look at it and we can discuss further. Let me know when you want to get together again. Addendum to RFP No. RFP-13-11355-CS</i>

¹⁴ This email was subsequently forwarded to Mr. Contreras by Ms. Costanzo on February 10, 2016.

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- *Trinity will provide a dedicated "24/7/365 Transportation Call Center and dedicated line for all incoming flight & transfer calls.*
- *Trinity will offer bed to bed transfer to JHS*
- *If client is a direct client of Trinity's, Trinity will collect coordination fee and bill Jackson per contracted AA.*
- *If client is a Jackson negotiated partner, Jackson will bill directly to client and collect. Trinity will bill Jackson per contracted AA rate.*
- **JHS and Trinity to market services of air and hospitalization to Trinity's clients ...**

(Emphasis added)

The following week, on February 1, Ms. Skroder shared a redacted invoice with Ms. Costanzo from Broward General, saying:

February 1, 2016, 12:57 p.m.

From: Inger Lisa Skroder To: Rosa Costanzo.

*Please see attached, whereby Broward paid for \$11,900 and the patient paid the air ambulance \$1,500. This is what we are proposing to Jackson. Trinity will receive calls for transport. **We work up our contractual rate with Jackson and the balance the patient, family and/or client pays.** Do you have time to speak today?*

(Emphasis added)

Within an hour of receipt of that communication, Ms. Costanzo forwarded the information to Mr. Contreras:

February 1, 2016, 1:39 p.m.

From: Rosa Costanzo To: Alex Contreras cc: Inger Lisa Skroder

*Alex, See below and attachment. This is a quick follow up/example **to the discussion we had with Trinity and the opportunity they have brought to our attention.** Let me know how I can help.*

(Emphasis added)

Ms. Skroder sent an email to Mr. Contreras within 8 minutes of being copied on Ms. Costanzo's forwarded email to Mr. Contreras. Ms. Skroder writes directly to Mr. Contreras:

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February 1, 2016, 1:47 p.m.

From: Inger Lisa Skroder To: Alex Contreras; Rosa Costanzo

Alejandro

We have potential patients for Jackson. For example, we have been contacted for an American Citizen who was on vacation, slipped and fx femur. He has Medicare and supplemental United Health Care. He wants to be transported tomorrow, Feb. 2nd. If we can use our contracted JHS rate and bill the patient the remainder, we would be able to bring him to Jackson tomorrow. Firstly, we would send over his Medical Coverage information to Jackson for "Financial Clearance". What are your thoughts?

As the email record illustrates, Trinity was persistent in its pursuit of payments under its Air Ambulance contract. Trinity advised the OIG that several ideas were presented, including a partnership for the operation of a call center, and even a suggestion to put the JHS logo on its aircraft for exclusive service. The February 1 emails are not mentioned in the OCE investigation notes reviewed by the OIG.

Soon thereafter, there was another meeting with Trinity and JHS officials, set for February 12, 2016, at 9:30 a.m. That meeting was being facilitated by the Senior Director of Procurement, Ms. Michelle Romano. The primary purpose of the meeting was to resolve outstanding invoices relating to the Organ Transport contract, where Trinity served as a secondary provider.¹⁵ The night before the meeting, Ms. Skroder submitted a list of issues she wanted to discuss with the Director of Procurement, among them was "*additional funding for air ambulance contract to cover remainder of contract.*"¹⁶

In response to Ms. Skroder's suggested agenda for the meeting, Ms. Costanzo replied and reminded her that the February 12, 2016, meeting was only to address concerns about the Organ Transport contract; any discussion regarding the Air Ambulance contract would need to include other people, such as Mr. Contreras. Minutes later, Ms. Costanzo advised Mr. Contreras in an email that:

February 11, 2016, 9:34 p.m.

From: Rosa Costanzo To: Alex Contreras

...Trinity is coming in for a mtg in purchasing at 9:30am if you'd like to join.

¹⁵ The OIG's review of emails found that Trinity, although proposing a new business venture to Mr. Contreras and Ms. Costanzo, was simultaneously pursuing its complaint regarding the REVA selection and other matters concerning their Organ Transport contract with various officials at JHS.

¹⁶ Email Subject: RE: Trinity Air // Jackson Meeting Friday, Feb 12, 2016 at 09:30 AM. From: Inger Lisa Skroder To: Michelle Romano. February 11, 2016 02:33 PM

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Rather than attend that meeting, Mr. Contreras encouraged Ms. Costanzo to bring the representatives of Trinity by his office between 10:00 and 11:00 a.m. on February 12, 2016.

On February 10, two days prior to Ms. Skroder's scheduled visit to JHS, Ms. Costanzo forwarded to Mr. Contreras the January 27 email from Trinity with the note: *"FYI- I don't think I had shared this communication."* The forwarded Trinity email outlined how the new venture might operate.

Forwarded to Contreras February 10, 2016 at 9:28 a.m.
January 27, 2016, 1:17 p.m.
From: Inger Lisa Skroder To: Rosa Costanzo

...I have put together the following list of how this venture would work. Take a look at it and we can discuss further. Let me know when you want to get together again. Addendum to RFP No. RFP-13-11355-CS Partners: Jackson Health System (JHS) - Trinity Air Ambulance International (Trinity)

- *Trinity will provide a dedicated "24/7/365 Transportation Call Center and dedicated line for all incoming flight & transfer calls.*
- *Trinity will offer bed to bed transfer to JHS*
- *If client is a direct client of Trinity's, Trinity will collect coordination fee and bill Jackson per contracted AA.*
- *If client is a Jackson negotiated partner, Jackson will bill directly to client and collect. Trinity will bill Jackson per contracted AA rate.*
- **JHS and Trinity to market services of air and hospitalization to Trinity's clients ...**

(Emphasis added)

The OCE, during its second investigation, asked Mr. Contreras about that January 27 email –forwarded to him by his colleague, Ms. Costanzo on February 10. Mr. Contreras claimed to have deleted the email stating: *"I did not want anything more to do with her. I think I may have deleted the email."*¹⁷ Although claiming to have deleted the email, the OCE reviewed it with Mr. Contreras. In reference to the email Mr. Contreras told the OCE that: *"I would never have agreed without it (contract modification) being in writing."*¹⁸ Whether he deleted it or not, the day after receiving that email, he agreed to a meeting and suggested to Ms. Costanzo that she bring the Trinity representatives by his office.

¹⁷ OCE Notes of Interview of Mr. Contreras, August 16, 2017. It should be noted that during the OIG's interview of Mr. Contreras, he clarified that he did not want anything more to do with Ms. Skroder.

¹⁸ OCE Notes of Interview of Mr. Contreras, August 16, 2017.

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There is no official JHS record of what transpired at the second meeting between the Trinity representatives and Mr. Contreras on February 12, 2016. In the OIG interview with Mr. Contreras, his recollection of the meeting at his office was a discussion about three issues: “[1]...invoices past due; [2] the fact that we were not using them as a primary vendor; and [3] the fact that they were the exclusive provider at Broward and they could do something similar for Jackson Health System.” Mr. Contreras’s responses to the OIG, and to the OCE, regarding his dealings with Trinity imply a lack of involvement or serious consideration on his part of Trinity’s requests and complaints. The emails reviewed by the OIG suggest otherwise.

For example, the OIG found that, prior to the February 12 meeting, Mr. Contreras had actively requested information from his employees and participated in a solution regarding Trinity’s primary vendor status complaint. Late on February 10, Ms. Skroder wrote an email complaining about an incident where JHS staff stated “that they would not use Trinity. They would only use Reva.” At 1:07 a.m., in the early morning of February 11, Mr. Contreras responded to Ms. Skroder and then pursued the matter. At 9:32 p.m. that night, Mr. Contreras advised both Ms. Costanzo and Ms. Skroder that the incident had been investigated, and that staff “has been reeducate[d]” and “expectations are very clear”. In reply, Ms. Costanzo advised Mr. Contreras of the meeting on February 12. Mr. Contreras responded that he would like to meet Trinity in his office and would “...like to go into detail as to what we implemented today”. Clearly Mr. Contreras was personally involved in resolving issues with Trinity; and did so well beyond the normal business hours. Yet Mr. Contreras had a poor recollection of discussions with Trinity. When questioned by the OIG, Mr. Contreras was vague when discussing Trinity’s inbound flight proposal, he characterized it as a discussion about “...the fact that they were the exclusive provider at Broward and they could do something similar for Jackson Health System.”

Despite Mr. Contreras’s assertion to the OCE that, well before approving the bulk of the payments, he “did not want anything more to do with her [Ms. Skroder],” the OIG found ongoing communications between Mr. Contreras and Ms. Skroder. Ms. Skroder and Mr. Contreras both told the OIG that Mr. Contreras provided Ms. Skroder with his contact information including his cellphone number. Mr. Contreras vividly recalled a call from Ms. Skroder as he was returning from the Florida Keys on Sunday, February 14, 2016. Ms. Skroder was seeking his assistance getting approval for the inbound transport of a patient; Mr. Contreras recalls advising her to speak with Ms. Diamela Corrales, the Director of the International Division.

Ms. Skroder clearly recalled the Friday, February 12, 2016, meeting with Mr. Contreras. The very next week, Ms. Skroder placed a follow-up call to Mr. Contreras regarding the discussions and then memorialized the conversations in an email sent on February 18, 2016:

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February 18, 2016, 11:03 a.m.

From: Inger Lisa Skroder To: Alex Contreras

Sorry to have interrupted your meeting. I am including Maria from my office in this email so she understands what we spoke about: the procedure for Incoming & Outgoing patients.

RE: JACKSON & TRINITY AIR AMBULANCE PROCEDURES

1. **Incoming patients**, Trinity will obtain “Financial Clearance” & Acceptance from the Jackson International or Jackson Domestic Department, and then Trinity will transport and then bill Jackson

2. **Outgoing patients**, Trinity will confirm health insurance coverage (for Subrogation purposes) and then Trinity will transport and then bill Jackson...

...*** Alex moving forward we will follow #1 and #2 procedures and just perform the missions – without having to bother you on each mission.

(Emphasis in the original)

There is no record of an email reply from Mr. Contreras to counter or challenge the vendor’s understanding of the process to follow.

The OCE questioned Mr. Contreras about the February 18 email. The OIG was advised by the OCE that Mr. Contreras did *not* open the February 18 email until *after* the OCE investigation had commenced. Although the OCE notes of the interviews do not refer to the email by date, the OCE states that Ms. Skroder “...had sent an email describing her perception. Alex was very busy at the time when [Ms. Skroder] sent the email referenced above. He did not read it until [Ms. Costanzo] mentioned it during a meeting that was called after it was brought to his attention that he paid invoices that Trinity had submitted for inbound patient transports.”¹⁹ The OCE accepted that Mr. Contreras was unaware of the proposal since he had not read the February 18 proposal email.

The OIG’s review of the emails between the parties found a clear reference to the February 18 email and its contents in an email sent by Ms. Skroder to Mr. Contreras on April 11; to which he replied on April 12.

¹⁹ OCE Notes of Interview of Mr. Contreras, July 19, 2017.

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April 11, 2016, 7:49 p.m.

From: Inger Lisa Skroder To: Alejandro Contreras. Cc: Rosa Costanzo; Maria/Trinity.

Good Evening Alejandro & Rosa

RE: Contract (RFP 13-11355-CS) On Friday, February 12, 2016, we had a meeting and our Contract (RFP) 13-11355-CS - Air Ambulance Transportation was discussed.

On Thursday, February 18th, 2016, I sent an email to Alex & Maria (Trinity's office manager) advising Maria of what was discussed and agreed upon at our February 12th meeting. I provided her with the Transport Procedure for Incoming & Outgoing Patients for Jackson (see attached). The next day, Trinity commenced transportation using our Contract and Rates. The procedure as follows:

1.Incoming patients, Trinity will obtain "Financial Clearance" & Acceptance from the Jackson International or Jackson Domestic Department, and then Trinity will transport and then bill Jackson

2.Outgoing patients, Trinity will confirm health insurance coverage (for Subrogation purposes) and then Trinity will transport and then bill Jackson...

(Emphasis added)

In Mr. Contreras's reply to Trinity on April 12, he did not repudiate the agreement, nor indicate he lacked knowledge of the referenced February 18 email. Importantly, not only was the February 18 email referenced, but it was attached. Furthermore, Mr. Contreras, acknowledged to the OCE, although claiming the import was only clear in hindsight, that Ms. Skroder had, at a meeting, indicated her impression that "he would authorize payments for any international patients they transported."²⁰

Regarding the January 21 meeting, when Trinity first discussed the proposal, Mr. Contreras told the OCE that "[w]e would not have agreed to pay for inbound patients. ...I do not agree that it was understood that we had an agreement."²¹ Mr. Contreras also told the OCE that Ms. Skroder mentioned an increase in the volume of patients for Jackson and "[w]hen she mentioned patients and volume together that did not smell good to me. After that meeting I had a very bad taste."²² Knowing that something was amiss, Mr. Contreras did not clarify the matter with the vendor. Instead, according to his statement

²⁰ OCE Notes of Interview of Mr. Contreras, July 19, 2017.

²¹ OCE Notes of Interview of Mr. Contreras, August 16, 2017.

²² Ibid.

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to the OCE and the OIG, he deleted the forwarded January 27 email, and failed to open or respond to the February 18 email.

In the absence of a response, the vendor moved forward with its stated plan to refer patients to JHS facilities and invoice for payments under the terms of the existing Air Ambulance contract. Without an explicit rejection of the scheme, the vendor apparently inferred tacit approval. From the vendor's perspective, the process outlined in the email was the same process that was always in place. Before a patient is brought into a healthcare facility, the hospital, through the International Department, confirms with the air ambulance provider that there is medical and financial clearance. The only differences, as a result of the meetings and conversations with JHS officials, was that there would be greater usage of the contract, and that inbound patients would be paid out of the existing contract.

JHS officials, have acknowledged to the OIG that paying for the air ambulance services of patients being referred to JHS facilities is contrary to the standard procedures in the hospital industry. However, during the first two months of 2016, as this new venture got underway, there is no evidence that Trinity was ever discouraged from steering their clients into JHS facilities. Mr. Contreras failed to respond in writing and explicitly repudiate the proposal put forth during two meetings by Trinity. It does not appear, that there was a misunderstanding between the parties.

Trinity ultimately outlined a program that did not require any contract amendments to cover inbound transports. In fact, the original bid solicitation documents did indicate the contract was to *"be used to transport patients **from and to** different locations in North America, South America and the Caribbean."*²³ Trinity emailed the proposal to Mr. Contreras on February 18, 2016, and received no objection to the procedures outlined. If Mr. Contreras truly did not want "anything more to do" with the vendor, and truly "...had a very bad taste" after meeting with the vendor, then failing to clarify with the vendor the proposal at the meeting, and failing to review the succeeding emails from the vendor was a neglect of his duty.

The absence of a clear and decisive repudiation of the proposal by Mr. Contreras resulted in Trinity, transporting patients into JHS facilities, and then billing JHS for the flights according to the terms of the existing Air Ambulance contract. This vendor-initiated program was launched with the knowledge and acquiescence of the Senior Vice President and Chief Administrative Officer of JHS, Mr. Contreras. The acquiescence is evident given the various email communications from the vendor that clearly propose inbound flights, the documented meetings held on at least two occasions, and a lack of communication to the vendor that such a proposal violates policy.

²³ Section 2.1 of PHT RFP-13-11355-CS.

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The Vice President and Chief Procurement Officer of JHS, Ms. Costanzo, assisted the vendor in expanding or increasing contractual services by providing introductions and arranging meetings with the user department. Her lack of due diligence in vetting the claims by the vendor that similar services were being offered to a Broward hospital contributed to the improper agreement. Had there been even minimal market research, such as a phone call to the Broward hospital referenced by Trinity in the early communications it would have been clear that paying for transportation services for patients referred by a vendor is not an acceptable practice in the healthcare industry.

Finding 2 The invoices submitted by Trinity for the inbound flights of patients referred to JHS facilities were knowingly approved for payment.

To understand the processing of the invoices for Trinity, the OIG sought an overview of the vendor payment system at JHS. According to Ms. Laura Scott, Director of Payroll and Accounts Payable, after JHS enters into a contract with a vendor, the Procurement Department assigns a Purchase Order number to that contract.

In order to get paid, vendors are instructed to submit invoices under their Purchase Order number to GHX, a healthcare business and data automation company in Salt Lake City, Utah. GHX confirms the invoice is properly formatted and complete and then transmits the data to an invoice approval software program at JHS known as Lawson. The Lawson system channels invoices via an automated email system known as ProcessFlow to the authorized and designated administrator(s) for that Purchase Order.²⁴ Management at JHS controls who is authorized to log on to Lawson and further limits which invoices an individual may approve.

The individuals with designated approval authority for a department are sent a Process Flow Lawson system email with the invoice. The OIG has learned from meetings with Accounts Payable personnel at JHS, that there are typically several administrators within the user departments and divisions designated to approve invoices. All the authorized individuals are sent a ProcessFlow Lawson system automated invoice email for each invoice waiting to be approved. For purchase order invoices *under* \$1 million, *any one* of the designated individuals in a user department may log on to the Lawson system and review, approve, or reject the invoice for payment. Authorized approvers must also verify receipt of the goods or services. Once any of the designated individuals approves an invoice in the Lawson system, the invoice is automatically transmitted to the Accounts Payable Division for payment. The volume of daily transactions at JHS is significant, as is the flow of money.²⁵

²⁴ "ProcessFlow" is the identified sender of emails originating from the Lawson software system.

²⁵ In FY 2018-2019 the total budget for JHS (operating and capital) is \$2.727 billion.

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By designating multiple individuals with approval authority, invoices are not delayed when an individual is on leave or otherwise unavailable. The Lawson system provides accountability by recording who approved the invoice for each transaction. Also, for efficiency purposes, there is no need for multiple layers of approval, i.e., there is no final approval by a Vice President or CFO for invoices *under* \$1 million.

At the time when the inbound air ambulance patient invoices from Trinity began flowing into the system, Mr. Contreras was not designated in the Lawson system as an authorized individual to approve invoices for Transportation. Mr. Contreras was added as an authorized approver for Transportation department invoices on March 21, 2016.²⁶ Prior to Mr. Contreras being authorized, Mr. Verdecia, the Director of Transportation, was a designated individual responsible for approving the Air Ambulance contract invoices.

A. The invoice approvals were not a mistake. The OIG review found the approvals were not the result of a single administrative approval of an invoice batch.

The OCE concluded in its August 18, 2017, Summary of Investigation Memorandum that the payments to Trinity for transporting their client-patients into JHS facilities occurred as a result of one single mistake, by one individual, who approved all the disputed invoices at once. The conclusion by the OCE is wrong.

The OCE writes: “*The JHS leader who approved the payment explained that he only reviewed the first invoice, which was not for an inbound patient, and he approved all invoices in the batch.*” The “JHS leader” referred to in the OCE memo is Mr. Contreras. The OCE conclusion is wrong for asserting one individual approved the invoices, and it is wrong again in asserting it was a mistake.

As the records reviewed by the OIG reveal, the 19 disputed paid invoices were approved for payment by 2 people on 3 different days. The following is a breakdown of the inbound transportation invoices approved:

Table 1: Number of Invoices Paid by Date and Approver

# of Invoices approved	Date Approved	Approved by	Date Paid
1	Feb. 25, 2016	E. Verdecia	April 13, 2016
16	April 11, 2016	A. Contreras	April 13, 2016
2	April 12, 2016	E. Verdecia	April 13, 2016
Total 19			

²⁶ JHS Service Request Number BS160320_0061 Recipient Alejandro Contreras

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The OIG found that most of the approvals, done by Mr. Contreras, occurred six weeks after Mr. Verdecia had approved one invoice and began to question the approval of the remaining invoices. Those approvals, and the questions raised by Mr. Verdecia and other JHS personnel are discussed in detail below.

1) One invoice approved by Mr. Verdecia on February 25, 2016

The OIG review found that starting on February 19th, the day after Trinity memorializes in an email its agreement for inbound transports to be billed to the JHS contract, Trinity contacts Mr. Verdecia about invoices. Ms. Maria Pejdanovska, Trinity's office manager, sends Mr. Verdecia, GHX (the data automation service), and Mr. Contreras an email with an attached invoice (16JHS0128KS). The invoice was for an inbound flight on January 28.²⁷ Ms. Pejdanovska's email references that early agreement: *"Good Afternoon, Further to Inger Lisa [sic] meeting with Mr. A. Contreras, please find attached our invoice for transport on January 28th of patient (KS). Please confirm receipt and advise us payment details."*

On February 23, 2016, another invoice (16JHS0122WM) for an inbound patient brought into JHS by Trinity prompted this exchange from Mr. Verdecia: *"I need a little more info on this one who arranged this call?"* Trinity responded to Mr. Verdecia and again referenced the agreement:

February 23, 2016 1:03 p.m. From: Trinity Air Ambulance – Maria To: Ernest Verdecia Cc: Alejandro Contreras
<i>This is another case that we arranged thru Jackson International. Patient was financially cleared by Miguel Del Toro, International Coordinator, International Department, Jackson Memorial Hospital.</i>
<i>Further to Inger Lisa's meeting with Mr. Contreras, we are following the directive of potential patients needing admission are to be "Financially Cleared" by Jackson International. Once the patient is "financially cleared" we transport to Jackson Memorial in Miami or Jackson North in North Miami depending on the patient's medical needs and bed space.</i>

Mr. Verdecia acknowledged the above by responding, "Got it." However, he did not approve invoice 16JHS0122WM in the Lawson system.

²⁷ The invoiced inbound transfer took place the day after Trinity's January 27, email to Ms. Costanzo with an outline of the process. That email and the outlined procedure was a follow-up to the January 21st meeting when the proposal was first discussed. The OIG review determined that the invoice was never approved.

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On February 25, 2016, Mr. Verdecia approved a different Trinity invoice for a patient brought into JHS on February 19, 2016 (Trinity Invoice #16JHS0219BH). Although, Mr. Verdecia approved the invoice in the Lawson system, the invoice was inexplicably not processed by Accounts Payable at that time. Eventually, the invoice was one of the 19 invoices paid on April 13, 2016, and subsequently investigated by the OCE.

Mr. Verdecia was asked by the OIG why he approved this particular invoice. He indicated he may have simply confirmed with the International Division that the patient had been brought in to JHS and did not do any further due diligence. However, as more Air Ambulance transport invoices began to arrive from Trinity, Mr. Verdecia began to ask questions.

2) Sixteen invoices approved by Mr. Contreras on April 11, 2016

Mr. Contreras asserted to the OCE that he approved all the invoices after reviewing the first invoice, which was not for an inbound patient. In fact, *all* 16 invoices approved for payment on April 11, 2016, by Mr. Contreras were for the transport of patients *into* JHS facilities.

When asked by the OIG about this discrepancy in his statement to the OCE, Mr. Contreras, declared under oath that he had not looked at any of the Trinity invoices, but had first reviewed a 'Transportation' (outbound) invoice, which may have been from an ambulance company providing ground transportation. He asserted that the first invoice he looked at seemed fine, so he just approved all the rest of the Transportation invoices without reviewing any of them. Based on our review of the electronic accounts payable system and the invoices submitted to Mr. Contreras, this explanation is not true.

The OIG reviewed records of all approvals on April 11, 2016, by Mr. Contreras and found that there were no other Transportation invoices from any other companies, nor for other services approved by Mr. Contreras that day. Mr. Contreras's assertion that he reviewed only the first invoice, an outbound transportation invoice, went unchallenged by the OCE. Notably, each of the 16 invoices approved by Mr. Contreras were docketed separately in the Lawson system. Mr. Contreras had to approve each invoice individually. In other words, these invoices were not batched for a single collective approval action.

It is evident from a review of all the correspondence that when he received the invoices for approval, Mr. Contreras, unlike Mr. Verdecia, had been kept "in the loop" throughout the patient referral initiative process. During the two-month window of this activity, Mr. Contreras was a party to numerous emails with references to Trinity inbound flights - some of those emails were initiated by him. Mr. Contreras had been copied on all the air ambulance invoices coming in from Trinity. Moreover, Mr. Contreras, in his OIG interview, asserted his view of an obligation towards Trinity stating: "they already provided a service and we have a responsibility to pay them."

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The OIG also found that Mr. Contreras was not an authorized approver on Transportation Department invoices until late March 2016. In fact on March 8, 2016, in response to an email from Ms. Pejdanovska at Trinity seeking confirmation that he had received an invoice (16JHS0307GD), Mr. Contreras curtly replied, "I do not process invoices."²⁸ Shortly thereafter, Mr. Contreras obtained authorization in the Lawson system to approve invoices under the Transportation cost code, # 99202.²⁹ The records indicate he was successfully designated as an "Invoice Reviewer" and "Invoice Approver" for cost code 99202 (the Transportation Department) on Monday, March 21, 2016, at 9:14 a.m. All of the Trinity invoices for inbound patient transportation were processed under cost code 99202.

When Mr. Contreras was interviewed by the OIG, he asserted that someone in Procurement directed the Lawson system to send him the invoices. The OIG has determined that the individual coordinating the flow of invoices to Mr. Contreras was Mr. Fidel Alvarez, Procurement Manager at JHS. In April of 2016, while Trinity was dunning the Transportation department for payment of the 22 inbound flights, Trinity was also "threatening to stop their services" if outstanding invoices under its Organ Transport contract were not paid. The OIG has learned that Mr. Alvarez was actively working to get Trinity paid for the Organ Transport contract invoices, even conveying a threat from the vendor. On April 11, 2016, Mr. Alvarez wrote to the accounts payable department:

April 11, 2016, 11:52 a.m. From: Fidel Alvarez To: Carmen Fernandez; Victoria Quintero; Laura Scott
<i>Team, I am giving you guys a heads up we will need to make a payment for this vendor today... I am trying to get all the emergency forms signed and invoices approved so that it can be processed, but we will need a check cut today, Sorry don't kill the messenger. This vendor is threatening to stop their services and this is for transplant we won't be able to pick up organs.</i>

The OIG has learned that procurement officials often convey messages to user departments on behalf of vendors complaining about past due payments. Procurement officials may serve as messengers, but the invoice approval function rests with the user department for a reason; user department personnel are able to confirm if a product has been delivered or a service has been rendered.

Mr. Alvarez was also aware of the outstanding Air Ambulance contract invoices for this same vendor and facilitated those payments as well. It is clear from the OIG's review, that there was a concerted effort on Monday, April 11, 2016, after 5:00 PM to transmit to Mr.

²⁸ Email. Subj: RE: JHS: G D – Invoice 16JHS0307GD from Trinity Air Ambulance International, LLC. From: Alejandro Contreras. To: Maria of Trinity Air. March 8, 2016; 3:15 PM

²⁹ JHS Service Request Number S160320_0061

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Contreras outstanding Trinity invoices for inbound patient transports. As Mr. Contreras was approving those Air Ambulance contract invoices, Mr. Alvarez sends an email to Ms. Pejdanovska stating:

April 11, 2016, 5:31 p.m. From: Fidel Alvarez To: Maria Pejdanovska
...we are also working on getting the other pending invoices that are related to po 8108421 SERV ³⁰ paid. Ill [sic] keep you posted tomorrow.

Beginning at 5:19 p.m., a series of 16 Trinity air ambulance inbound patient invoices began to arrive from the Lawson accounts payable system into Mr. Contreras's inbox.³¹ The final Trinity invoice to Mr. Contreras arrived at 5:31 p.m. on April 11, 2016. Mr. Contreras in approving the Trinity invoices coordinated his efforts with Mr. Alvarez in Procurement, an individual, that according to Mr. Contreras's statement to the OIG, he "worked with in the past and that I trust."

The OIG has learned that Mr. Alvarez and Mr. Contreras have been professional colleagues for several decades. These two senior JHS administrators worked together at Coral Gables Hospital, a Tenet Healthcare facility, for a number of years in the late 1990's. Mr. Contreras served as CFO at Coral Gables Hospital from 1996 – 1999.³² Fidel Alvarez worked as the Materials Manager for Coral Gables Hospital from 1973-2000.³³ Mr. Contreras repeatedly declared (to the OCE and to the OIG) that he trusted Mr. Alvarez. Based on this trust, Mr. Contreras implied he was confident the invoices Mr. Alvarez asked him to approve were valid and appropriate. Mr. Contreras may have trusted Mr. Alvarez but reviewing invoices prior to payment is not a job responsibility of a procurement manager, which Mr. Contreras as a senior administrator should have known. Moreover, our review found nothing to suggest that Mr. Alvarez had reviewed the invoices signaling that they were okay for payment.

Mr. Contreras explained to the OIG that the manager of the department reviews and initially approves invoices. His explanation is incorrect for invoices under \$1 million, such as the Trinity invoices. On all 16 Lawson system invoice emails Mr. Contreras received

³⁰ Purchase Order (PO) 8108421 SERV is the PO for the Air Ambulance contract. The nineteen (19) inbound patient transport invoices were all under PO8108421 SERV.

³¹ Email Subject: Requiring approval for I/B invoice 16JHS0308GD. From: ProcessFlow (Lawson). To: Ernest Verdecia; Maria Santiago; Arianet Gonzalez; Luis Fernandez; Alejandro Contreras. cc: Cedrina Murphy Russel. April 11, 2016; 5:19 p.m.

³² Mr. Alex Contreras-Soto, Sr. Vice President and CAO at Jackson Memorial Hospital. LinkedIn. May 23, 2018. (Note: the LinkedIn content has since been revised.)

³³ Fidel Alvarez, Procurement Manager at Jackson Health System. LinkedIn. May 23, 2018

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on April 11, 2016, Mr. Verdecia was the first named recipient.³⁴ Mr. Contreras would have been able to discern from the Lawson system that the Director of Transportation, Mr. Verdecia, had not reviewed or approved any of the invoices. More importantly, Mr. Contreras, was aware, at that time, that Mr. Verdecia and the International Department were concerned about paying the invoices and were researching the matter.

The OCE summary of Mr. Contreras's interview states: "...Alex received a call from Fidel Alvarez in Procurement who said he had multiple invoices for Trinity that must be paid, as they were having issues with the vendor (complaints), and he asked Alex to approve them. Alex assumed they were routine invoices for outbound patient transports and approved them." (Emphasis in the original) This assumption was not questioned by the OCE.

By the time Mr. Contreras says Mr. Alvarez called him for assistance, he had been a party to numerous emails pertaining to inbound flights that referenced meetings he attended. The lack of outbound flight business was the genesis for the Trinity proposal to refer inbound patients to Jackson. Moreover, Mr. Contreras was aware that JHS Department Directors were questioning the invoices. Nothing about Mr. Contreras's approval of this series of inbound patient transports was routine, as he had no history of approving this vendor's invoices, or any other transportation invoices, prior to the actions taken on April 11, 2016.

On Monday, April 11, at 4:28 p.m. Ms. Corrales emailed Mr. Contreras and Mr. Alvarez advising that her department was working on a report detailing the invoices from Trinity and the records of patient insurance. Mr. Contreras had made this request for research materials on Friday, April 8.

April 11, 2016, 4:28 p.m. From: Diamela Corrales To: Alejandro Contreras; Fidel Alvarez
We are still working on this report, <u>should be ready by tomorrow morning.</u> (Emphasis added)

Even if he had not seen Ms. Corrales's email, Mr. Contreras understood he did not have all the information he had requested prior to approving the Trinity invoices. At 5:20 p.m. on April 11, Mr. Contreras approved the 16 inbound patient Trinity invoices, one-by-one over a span of 11 minutes.

Less than thirty minutes later, at 5:57 p.m., Ms. Armengol sent the preliminary research material to her supervisor, Ms. Corrales. Ms. Armengol's email explains the hesitation by the International and Transportation Department to approve the invoices. The OIG has

³⁴ Email. Subject: 16JHS0223MZ Vendor: TRINITY AIR AMBULANCE requires your approval. From ProcessFlow@jhs-miami.org. To: Ernest Verdecia; Maria Santiago; Luis Fernandez; Alejandro Contreras; Arianet Gonzalez. Cc: Cedrina Murphy Russell. Monday April 11, 2016; 5:31 p.m.

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learned that at that time, neither Ms. Armengol nor Ms. Corrales were aware that Mr. Contreras had already approved the bulk of the invoices. The fact that the International Department was researching the matter, at his request, and that Mr. Verdecia was reluctant to approve the invoices did not inhibit Mr. Contreras. Instead, the electronic record reveals methodic haste, as the table below illustrates.

Table 2 – Invoices Approved by Mr. Contreras on April 11, 2016.

Invoice #	Inbound/ Outbound	Patient Location	Date of Approval	Time
16JHS0307GD	Inbound	Montego Bay, Jamaica	4/11/2016	17:20:34
16JHS0308DG	Inbound	Kingston, Jamaica	4/11/2016	17:21:25
16JHS0310CK	Inbound	Cape Haitien, Haiti	4/11/2016	17:22:24
16JHS0311KC	Inbound	Marsh Harbor, Bahamas	4/11/2016	17:23:34
16JHS0311DB	Inbound	Rock Sound, Bahamas	4/11/2016	17:23:57
16JHS0311JB	Inbound	Marsh Harbor, Bahamas	4/11/2016	17:24:20
16JHS0314VP	Inbound	Grand Turk, Turks & Caicos	4/11/2016	17:26:08
16JHS0317PA	Inbound	Nassau, Bahamas	4/11/2016	17:26:39
16JHS0317AA	Inbound	Port Au Prince, Haiti	4/11/2016	17:27:16
16JHS0327FV	Inbound	Freeport, Bahamas	4/11/2016	17:27:45
16JHS0327SQ	Inbound	Grenada	4/11/2016	17:29:17
16JHS0328NM	Inbound	Santo Domingo, Dominican Republic	4/11/2016	17:29:48
16JHS0329MS	Inbound	Provo, Turks & Caicos	4/11/2016	17:30:27
16JHS0304AR	Inbound	Bonaire	4/11/2016	17:31:00
16JHS0227GB	Inbound	Governor's Harbor, Bahamas	4/11/2016	17:31:35
16JHS0223MZ	Inbound	Cozumel, Mexico	4/11/2016	17:31:57

It is not clear whether the OCE reviewed the extensive internal communications between the department directors. However, it is evident that the obvious inconsistencies and glaring gaps were not raised by the OCE during the interviews with Mr. Contreras.

A couple of minutes after the last invoice arrived, Mr. Contreras emailed Mr. Alvarez:

April 11, 2016, 5:34 p.m. From: Alejandro Contreras. To: Fidel Alvarez.
<i>I think I got them all. I have nothing in my inbox or coming in. My Bday today so I am leaving now. I waited but I am not getting anything more.</i>

Mr. Alvarez acknowledges the email, saying:

April 11, 2016, 5:36 p.m. From: Fidel Alvarez. To: Alejandro Contreras.
<i>Thank you ill check if not it will have to be tomorrow, thank you, and have a wonderful Birthday HAPPY BIRTHDAY MY FRIEND!!!!!!</i>

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About a half an hour later, Mr. Contreras responds from his cell phone,

April 11, 2016, 6:10 p.m. From: Alejandro Contreras. To: Fidel Alvarez.

<i>Nothing more came through.</i>

As the exchange makes abundantly clear, Mr. Contreras fully intended to approve the disputed invoices from Trinity – *“I think I got them all.”*

Those 16 invoices approved by Mr. Contreras on April 11, were electronically paid to the vendor on April 13, 2016. There were 3 other approved invoices bundled in that April 13, electronic payment to Trinity. The first one (16JHS0219BH) had been approved by Mr. Verdecia on February 25, 2016, before he learned of the strong objections raised by the professional staff of the International Department. In that instance, Mr. Verdecia indicated he may have simply confirmed with the International Department that the patient had been brought into JHS and did not do any further due diligence. Though approved on February 25, 2016, invoice 16JHS0219BH was not immediately processed for payment. The other two invoices were also approved by Mr. Verdecia on April 12, 2016.

3) Two more invoices approved by Mr. Verdecia on April 12, 2016

Mr. Verdecia approved the other 2 invoices from Trinity the *day after* Mr. Contreras approved the series of 16 pending invoices. At the time when Mr. Verdecia signed off on those pending invoices: 1) Mr. Verdecia had received a prodding email from Ms. Costanzo, and, 2) the Director of Operations, Mr. Luis Fernandez had assented to the approvals. The review of the email traffic preceding the approval action by Mr. Verdecia at 11:58 a.m. on April 12, 2016, suggests the parties were unaware that Mr. Contreras had already approved the bulk of the pending Trinity invoices.

On April 11 at 4:22 p.m., prior to the approval by Mr. Contreras, Ms. Costanzo emailed Mr. Verdecia asking who was responsible for approving the 22 invoices and whether they had been approved. At 4:59 p.m. Ms. Costanzo wrote to Mr. Verdecia, and Mr. Alvarez, copying Mr. Fernandez, that she found the PO for the inbound transports and that Trinity had contacted her about the payment status of the 22 invoices.

At 6:32 p.m. Mr. Verdecia wrote to Ms. Costanzo and copied Mr. Alvarez and Mr. Fernandez:

April 11, 2016, 6:32 p.m.

From: Ernest Verdecia To: Rosa Costanzo; Fidel Alvarez cc: Luis Fernandez

<i>These are international patients that Trinity brought into our facilities I can't approve invoices that pertain to- International When I forwarded these to Elvia from that department she said they should bill insurance I</i>

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have no way of reconciling since its [sic] not my patient that I approved transport

Unbeknownst to Mr. Verdecia, when he responded to Ms. Costanzo at 6:32 p.m., Mr. Contreras had already approved 16 invoices. Trinity, also unaware of Mr. Contreras's approval, was persistent in trying to get payment for all outstanding invoices. Late that evening, Ms. Skroder wrote to Ms. Costanzo:

April 11, 2016, 7:31 p.m.
From: Inger Lisa Skroder To: Rosa Costanzo

Rosa, All cases have been "Financially" and "Medically" cleared thru Jackson International.

A few minutes later at 7:49 p.m. Ms. Skroder wrote directly to Mr. Contreras and Ms. Costanzo delineating the agreement reached on February 12 and the memorialization of the agreement through her February 18 email. Ms. Skroder copied the agreement laid out in the February 18 email. In her email Ms. Skroder also noted:

April 11, 2016, 7:49 p.m.
From Inger Lisa Skroder To: Alejandro Contreras; Rosa Costanzo

...On each and every case, Trinity obtained from the International Department (and I believe one from the Domestic Department) Financial and Medical Clearances (we have copies of emails from the International Department there is "clearances" for each transfer). For cases that could not be financially cleared, we have had to transport to other facilities. Maria then sent invoices, per the Contracted rates, to Ernie, who acknowledged each one. He has requested confirmation of with whom at the Jackson International Department who provided the clearance – and we provided that information to him. He then replied to Maria that he had "approved" the invoice, for each one.

The process appeared to be flowing well so I am not sure what the hold-up is on the payments for the invoices. Can you let us know when we should expect payment. We would like to continue to refer patients to Jackson, since JHS can handle all cases & the outcomes have been positive.

In addition, I have spoken with Rosa with regards to other clients that I believe collaboratively we could approach and present Jackson as the primary care provider. Let me know when you both can meet to further discuss.

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Mr. Verdecia could not clearly remember approving the invoices on April 12, 2016, but recalled to the OIG that “there was a lot of heat from Alex” to pay Trinity. Mr. Verdecia had also quipped during his OIG interview, “If there’s no insurance, you got to pay them” - a familiar refrain from an earlier email sent by Mr. Contreras.³⁵ The email traffic on the topic of Trinity getting paid was very busy on the morning of April 12, 2016.

Ms. Costanzo was clearly not aware of Mr. Contreras’s approval of invoices the evening before when she began addressing this topic on April 12, 2016. She forwarded the entire message detailing the agreement that she had received from Ms. Skroder the night before to Mr. Verdecia and Mr. Fernandez, with a copy to Mr. Contreras, and included her own encouraging message:

Tuesday, April 12, 2016 8:21 a.m. From: Rosa Costanzo To: Ernest Verdecia; Luis Fernandez Cc: Alejandro Contreras.
<i>FYI - this should help with payment review and approvals</i>

The records show that after receiving that email from Ms. Costanzo, Mr. Verdecia reached out to his superior, Mr. Fernandez. He forwarded Ms. Costanzo’s email and stated:

Tuesday, April 12, 2016, 10:51 a.m. From: Ernest Verdecia. To: Luis Fernandez.
<i>Your thoughts?? If Alex agreed I don’t have a problem approving these invoices.</i>

Mr. Verdecia separately forwarded Ms. Costanzo’s email containing Ms. Skroder’s outline of the agreement to Ms. Corrales:

April 12, 2016, 10:52 a.m. From: Ernest Verdecia To: Diamela Corrales
<i>Please read this attachment I’m checking to see if Alex approved this or not</i>

Ms. Corrales responded:

April 12, 2016, 10:55 a.m. From: Diamela Corrales To: Ernest Verdecia
<i>Thanks Ernie, please keep me posted, International was not aware nor involved in any of these negotiations.</i>

³⁵ Email Subject: RE: JHS invoices – 22 Air Ambulance Invoices // Trinity Air Ambulance. From Alejandro Contreras. To: Ernest Verdecia; Maria/Trinity; Diamela Corrales. Cc: Rosa Costanzo; Inger Lisa Skroder. April 8, 2016; 4:35 p.m.

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Mr. Fernandez, before responding to the 10:51 a.m. email from Mr. Verdecia asking for his opinion, was copied on another email from Ms. Costanzo at 11:17 a.m. advising Ms. Skroder “*I do not have an update. I am copying the team that is working on this.*” Shortly after that, Mr. Fernandez responded to Mr. Verdecia:

Tuesday, April 12, 2016, 11:25 a.m. From: Luis Fernandez. To: Ernest Verdecia.
<i>Yes, approve based on the transport procedure you attached and Alex’s comments from last week.</i> ³⁶

According to the Lawson system, at 11:58 a.m., Mr. Verdecia approved the remaining 2 invoices for Trinity. Mr. Verdecia’s approvals of the last 2 invoices on April 12, 2016, were not inadvertent mistakes. Mr. Verdecia followed the lead of Mr. Contreras and the urgings of Ms. Costanzo. When directly questioned about the approvals on April 12, 2016, Mr. Verdecia made no claim that his actions were inadvertent or in error. He simply could not remember the approvals.

B. Concerns were raised by JHS department directors prior to the invoices being approved.

During Mr. Verdecia’s interview with the OIG, he recalled becoming concerned when multiple invoices began to come to him to pay the air ambulance transportation expenses of international patients. He had not arranged the service and was “not in the loop” for the inbound air transportation. The Transportation Department was not accustomed to handling incoming air ambulance flights, as they primarily arrange ground transportation movements of patients within JHS facilities. Mr. Verdecia’s department would also have been responsible for payment of outgoing air ambulance flights under the contract with Trinity. Since April of 2014, there had only been 5 outbound transports.³⁷

On April 2, 2016, Trinity emailed Mr. Verdecia to inquire about unpaid inbound transportation invoices. Mr. Verdecia, then began, as evident by the OIG’s review of emails, to gather information about the invoices. Mr. Verdecia requested to know who in accounts payable was handling the invoices. He also asked Trinity to provide a list of all inbound transports.³⁸ Finally, Mr. Verdecia requested assistance from Ms. Elvia

³⁶ The only relevant comment from Mr. Contreras found by the OIG in the email records, was Mr. Contreras’s statement on April 7, 2016 in an email to Verdecia. Mr. Contreras stated: “Follow up standard procedure for processing patients” in response to Verdecia’s request “Fyi please advise” regarding the 22 Trinity invoices.

³⁷ A JHS Internal Audit identified one (1) outbound flight by REVA; August 2015 payments to Trinity for two (2) patient flights were not included in the Demand Letter of October 11, 2016; and two (2) patient flights by Trinity were clearly identified as outbound in a JHS spreadsheet provided to the OIG.

³⁸ Email Subject: RE: JHS Invoices. From: Ernest Verdecia. To: Inger Lisa Skroder. Cc: Maria/Trinity. April 5, 2016; 2:16 p.m.

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Armengol, the Operations Supervisor of Jackson International, an office of JHS that provides specialized concierge services to non-domestic patients.

Air ambulance providers routinely transport patients into JHS. To facilitate non-domestic patients, Jackson International communicates with the air ambulance service providers to ensure accepting physicians have granted medical clearance. They also obtain financial clearance for the patients; validating insurance coverage or establishing credit prior to admitting patients to JHS. The financial clearance is meant to ensure payment for medical treatment. Payment of the air ambulance transportation costs are not reviewed by Jackson International, as that payment is between the air ambulance provider and the patient and/or patient's insurance.

In order to authorize payment of the Trinity invoices, Mr. Verdecia would have had to verify that the service invoiced was provided. Because international patients brought into JHS are under the purview of the International Department, not the Transportation Department, Mr. Verdecia wrote to Ms. Armengol:

Tuesday, April 5, 2016, 1:35 p.m. From: Ernest Verdecia To: Elvia Armengol
<i>Hi Elvia, I'm receiving invoices from Trinity on patients they are bring [sic] into our facilities, but there is no way for me to verify, Can you help?</i>

On April 6, 2016, Ms. Armengol advises Mr. Verdecia

Wednesday, April 6, 2016, 12:35 p.m. From: Elvia Armengol To: Ernest Verdecia CC: Diamela Corrales
...we are unaware of the reasons why Trinity would be billing JMH. Therefore, as per Diamela please reach out to Mr. Contreras for further insight.

Mr. Verdecia learned from the International Department that JHS does not usually pay for the air transportation costs of inbound international patients. On April 7, 2016, Mr. Verdecia forwarded that email correspondence to Mr. Fernandez, and wrote:

Thursday, April 7, 2016, 10:32 a.m. From: Ernest Verdecia To: Luis Fernandez CC: Alejandro Contreras
<i>Hi Louie, Trinity is billing us for calls they are bringing in to North and main, but the international dept. says they should bill insurance, they are not authorizing payment. Can you check with Alex Contreras maybe there is an arrangement I don't know about?</i>

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Mr. Contreras, who was copied on that email chain, responded:

Thursday, April 7, 2016, 1:12p.m. From: Alejandro Contreras To: Ernest Verdecia CC: Luis Fernandez
<i>If patient had insurance the insurance company should be billed</i>

On April 7, 2016, Trinity responded to Mr. Verdecia with a list of 22 patients they had transported, fifteen (15) of them during the month of March alone:³⁹ The invoices listed by Trinity included an October 2015 invoice.⁴⁰ The remainder of the invoices were for transports that commenced after Trinity met with Mr. Contreras and proposed greater utilization of the existing air ambulance contract. One invoice is for a flight on January 28th, the day after Trinity sent an email proposing an expansive contract modification pursuant to their January 21 meeting with Mr. Contreras. The remaining 20 invoices were for flights starting on February 19, the day after Trinity memorialized its understanding of an agreement reached at the February 12 meeting with Mr. Contreras. Table 3 lists the Trinity invoices and amounts.

Table 3: List of Trinity Invoices sent to Mr. Verdecia

#	Date of Transport	Trinity Invoice #	Amount
1	Oct. 17, 2015	15JHS1017YB	\$19,920.00
2	Jan. 28, 2016	16JHS0128KS	\$10,000.00
3	Feb. 19, 2016	16JHS0219BH	\$17,254.88
4	Feb. 22, 2016	16JHS0222WM	\$15,134.40
5	Feb. 23, 2016	16JHS0223MZ	\$15,134.40
6	Feb. 27, 2016	16JHS0226GB	\$10,089.00
7	Feb. 28, 2016	16JHS0228LS	\$ 7,185.20
8	Mar. 4, 2016	16JHS0303AR	\$25,055.00
9	Mar. 7, 2016	16JHS0307GD	\$17,272.50
10	Mar. 8, 2016	16JHS0308DG	\$16,922.50
11	Mar. 8, 2016	16JHS0308SS	\$16,922.50
12	Mar. 10, 2016	16JHS0310CK	\$16,722.60
13	Mar. 11, 2016	16JHS0311KC	\$ 8,740.50
14	Mar. 11, 2016	16JHS0311DB	\$15,682.10
15	Mar. 11, 2016	16JHS0311JB	\$ 8,673.38
16	Mar. 14, 2016	16JHS0314VP	\$17,159.10
17	Mar. 17, 2016	16JHS0317PA	\$10,675.00
18	Mar. 17, 2016	16JHS0317AA	\$17,632.00
19	Mar. 27, 2016	16JHS0327FV	\$ 6,742.80
20	Mar. 27, 2016	16JHS0327SQ	\$30,904.50
21	Mar. 28, 2016	16JHS0328NM	\$20,201.00
22	Mar. 29, 2016	16JHS0329MS	\$15,999.00

³⁹ Email Subject: RE: JHS invoices – 22 Air Ambulance Invoices // Trinity Air Ambulance. From Maria/Trinity. To: Ernest Verdecia. Cc: Rosa Costanzo. April 7, 2016; 11:59 AM.

⁴⁰ The OIG did not investigate the circumstances surrounding the 2015 Trinity inbound transportation invoice. That single invoice was prior to the meetings between Trinity and JHS management regarding transporting patients to JHS.

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Upon receiving the list from Trinity on April 7, 2016, Mr. Verdecia forwarded it to Mr. Fernandez and Mr. Contreras and asked for assistance: *"FYI please advise."* Mr. Contreras replied:

Thursday, April 07, 2016 1:15 p.m. From: Alejandro Contreras To: Ernest Verdecia. Cc: Luis Fernandez

<i>Follow up standard procedure for processing patients</i>

On April 8, at 4:00 p.m., Mr. Verdecia advised Trinity that he had contacted JHS's International department about the invoices; Ms. Costanzo was copied on that email.⁴¹ Trinity replied that same day and again referenced the agreement with Mr. Contreras. In that reply, Ms. Costanzo was copied as well. Trinity stated:

April 8, 2016 4:12 p.m. From: Trinity Air Ambulance To: Ernest Verdecia cc: Rosa Costanzo
--

<i>Thanks for your reply Ernie</i> <i>I am a little confused. We were advised by Mr. Alejandro Contreras to send invoices to you and you were to send for processing. And when I emailed you the invoices (and 99% are International), you have reviewed them and replied, for example:</i> <i>1. For date of service January 28, 2016, patient K. S. you wrote back "Approved!! We will process through our system asap" (see attached email...).</i> <i>2. For date of service February 19, 2016, patient B.E.H. you wrote back." Approved! Please process asap! Thanks"</i> <i>For date of service March 17, 2016, patient AA you wrote back "received thanks" (see attached email...)</i>
--

Mr. Verdecia immediately replied at 4:35 p.m., including Mr. Contreras, and copied Ms. Costanzo:

Friday, April 8, 2016, 4:35 p.m. From Ernest Verdecia. To Maria/Trinity; Alejandro Contreras. Cc: Rosa Costanzo; Inger Lisa Skroder.

<i>Maria</i> <i>Yes I understand but these are international patients, after I checked with international they advised when a patient is brought into our facility you are to bill patients [sic] insurance</i>
--

⁴¹ Costanzo, who had been involved in the discussions of inbound transports had also been copied by Trinity on the email to Mr. Verdecia listing the invoices, and on a follow-up email seeking confirmation of receipt of the list.

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Since this is not my normal scope of service I turfed them to international for final approval and that's what was advised yes I gave the initial approval but its [sic] up to them for final approval since its [sic] their patient

Sorry for the confusion please call me Monday to discuss

At that time, only Mr. Contreras and Ms. Costanzo had been privy to meetings and emails regarding Trinity's inbound transport venture. Given Mr. Verdecia and Ms. Corrales's questions, and the fact that the vendor was indicating this was a procedure approved by Mr. Contreras, neither Mr. Contreras nor Ms. Costanzo took any action to clarify any misperceptions Trinity may have had regarding their understanding of this new business under the contract.

Concerned about the volume of this new transportation activity, Mr. Verdecia told the OIG that he handed the matter over to Mr. Fernandez to resolve with Mr. Contreras, or possibly with Mr. Don Steigman, Executive Vice President and Chief Operating Officer of JHS. Within a half-hour after Mr. Verdecia's email to Trinity, Ms. Skroder had a telephone conversation with Ms. Costanzo. Ms. Skroder then forwarded Mr. Verdecia's email to Ms. Costanzo and wrote:

Friday, April 8, 2016, 5:03 p.m.

From: Inger Lisa Skroder To: Rosa Costanzo

Rosa Thank you for your time on the phone. When we met with Alex, he advised us that he wanted patients and for us to: 1. Finanacially [sic] & Medically clear the patients thru Jackson International or Domestic 2. Arrange transportation to Jackson 3. Then bill Jackson thru our contract

We followed the directive and steps on all cases. Maria then sent the invoices to Ernie & he replied to all of them all, stating "approved", "please process asap"...etc

So I am not sure what the issue is now for the delay in payment. We did as we were instructed to.

Can you please follow up with me on Monday, April 11 2016? I woul [sic] dlike [sic] to get paid.

Mr. Contreras and Ms. Costanzo were very aware of the intransigence of Mr. Verdecia regarding the invoices. A sidebar electronic conversation between Ms. Costanzo and Mr. Contreras, sparked by Mr. Verdecia's reticence, speaks directly to the very nature of the arrangement with Trinity:

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Friday, April 8, 2016, 5:06 p.m.
From: Rosa Costanzo. To: Alejandro Contreras.

Alex – These invoices require payment for Trinity. There are a few like this. I believe they understand they are to bring patients bill and then go after insurance for these cases.

Friday, April 8, 2016; 5:11 p.m.
From: Alejandro Contreras. To: Rosa Costanzo.

Rosa – I understand but I do not process. I want to be involved only if there is a major issue. Ernie is [sic] got to handle day to day

Friday, April 8, 2016, 6:02 p.m.
From: Rosa Costanzo. To: Alejandro Contreras.

I understand. I'm sorry to bother you with it. I was not asking you to process. I understand you are a SVP in our system. I wanted to share it with you because I feel that he is not understanding the bigger picture on how we need to move quickly to have the patients come here instead of our competition. We turn them away and Broward and Baptist pick them up quickly.

(Emphasis added)

This statement from Ms. Costanzo, unchallenged by Mr. Contreras, clearly reveals the intended purpose of transporting patients to JHS – to maintain a competitive advantage over other regional hospitals. If, as the OCE concluded, there had been a misunderstanding between the parties, both Ms. Costanzo and Mr. Contreras should have, at that point, addressed the matter with Trinity. Instead, at 6:04 p.m. Mr. Contreras wrote:

Friday, April 8, 2016, 6:04 p.m.
From: Alejandro Contreras. To: Rosa Costanzo.

I want to be able to address when it is escalated. I already e mail [sic] Ernie

Mr. Contreras had in fact, emailed Mr. Verdecia and Ms. Corrales, copying Ms. Costanzo:

Friday, April 8, 2016 5:19 p.m.
From: Alejandro Contreras To: Ernest Verdecia; Diamela Corrales cc: R Costanzo; I Skroder

Ernie/Diamela- We need [sic] check if patients had insurance and provide this information. If insurance does not pay we need to. Insurance info must be provided so they can bill if they can get pay [sic]

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On Monday, April 11, at 4:28 p.m. in response to Mr. Contreras request, Ms. Corrales emailed him and Mr. Alvarez advising that her department was working on a report detailing the invoices from Trinity and the records of patient insurance.

April 11, 2016, 4:28 p.m. From: Diamela Corrales To: Alejandro Contreras; Ernest Verdecia
We are still working on this report, <u>should be ready by tomorrow morning.</u> (Emphasis added)

At 5:20 p.m. on April 11, Mr. Contreras began to approve the 16 inbound patient Trinity invoices.

Less than thirty minutes later, at 5:57 p.m., Ms. Armengol sent the preliminary research material to her supervisor, Ms. Corrales. Ms. Armengol's email explains the hesitation by the International and Transportation Departments to approve the invoices. Ms. Armengol advised Ms. Corrales that:

April 11, 2016, 5:57 p.m. From: Elvia Armengol to Diamela Corrales
<i>It is confusing as all Air Ambulance companies obtain their our pre-authorization for payment directly from the insurance companies in order to cover their services, also insurance information was provided by Trinity to JMH (we had never received copies of any invoices from Trinity in past). In some cases patients have Medicare and usual practice since Medicare does not cover transfers is that AA collects funds from the member/family for AA services. Therefore, not sure why JMH is being billed but in any case please note below (Trinity also needs to keep in mind insurances usual take up to 120 days from the date of receipt of clean claim and none of the below have passed that time frame, if they already billed.)</i>

Unaware of the approval activities already undertaken by Mr. Contreras, Mr. Verdecia made clear his reluctance to approve the Trinity invoices in an email response to Ms. Costanzo:

April 11, 2016, 6:32 p.m. From: Ernest Verdecia. To Rosa Costanzo; Fidel Alvarez. Cc: Luis Fernandez
<i>These are international patients that trinity brought into our facilities I can't approve invoices that pertain to International When I forwarded these to Elvia from that department she said they should bill insurance I have no way of reconciling since it's not my patient that I approved for transport</i>

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Clearly, the Director of Transportation, the head of the only department eligible to expend funds based on the purchase order, was not “in the loop,” nor willing to approve the Trinity invoices.

Also unaware of the approval actions of Mr. Contreras, late on April 11, Ms. Skroder sent a new email to Mr. Contreras and Ms. Costanzo reiterating their understanding. The OCE investigation makes no reference of this email. Ms. Skroder’s email reminds Mr. Contreras and Ms. Costanzo of: 1) the agreement reached on February 12, 2) the February 18, email memorializing the agreement, and 3) expresses a desire to “continue to refer patients to Jackson” and is perplexed by the “hold-up” in payments. Ms. Skroder also stated:

<p>April 11, 2016, 7:49 p.m. From: Inger Lisa Skroder To: Alejandro Contreras. Cc: Rosa Costanzo; Maria/Trinity.</p> <p><i>Since February 18th, a total of 20 new patients have been brought to Jackson. Most if not all, have been of high acuity, requiring ICU stays. These patients could have been accepted at other facilities.</i></p> <p><i>On each and every case, Trinity obtained from the International Department (and I believe one from the Domestic Department) Financial & Medical Clearances (we have copies of emails from the International Department these "clearances" for each transfer). For cases that could not be financially cleared, we have had to transport to other facilities. Maria then sent invoices, per the Contracted rates, to Ernie, who acknowledged each one. He has requested confirmation of with whom at the Jackson International Department who provided the clearance - and we provided that information to him. He then replied to Maria that he had "approved" the invoice, for each one.</i></p> <p><i>The process appeared to be flowing well so I am not sure what the hold-up is on the payments for the invoices. Can you let us know when we should expect payment. We would like to continue to refer patients to Jackson, since JHS can handle all cases & the outcomes have been positive.</i></p> <p><i>In addition, I have spoken with Rosa with regards to other clients that I believe collaboratively we could approach and present Jackson as the primary care provider. Let me know when you both can meet to further discuss.</i></p> <p style="text-align:right">(Emphasis added)</p>
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Ms. Skroder asserted that Mr. Verdecia had “approved” each one of the invoices submitted to him. The OIG found that Mr. Verdecia had received numerous emails from Trinity prior to receiving the list of invoices on April 2. In email after email reviewed by the

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OIG, Trinity requests approval from Mr. Verdecia and he replies “approved”, although he does not approve the invoices in the Lawson system. Both Mr. Verdecia and the vendor were aware that invoices are processed through the GHX/Lawson system. Mr. Verdecia’s “approval” was apparently a mere acknowledgment of receipt of vendor invoices. It is, however, a careless use of a term of art by a department director. Given that he did not actually verify receipt of the services when he replied, he should have merely “acknowledged” receipt of the invoices, and not stated that they were “approved.”

Nevertheless, the only record of *actual* invoice approval by Mr. Verdecia for an inbound patient in the Lawson system, prior to April 2016, was the previously mentioned invoice approved on February 25, 2016, invoice (16JHS0219BH). Although Mr. Verdecia had approved the invoice on February 25, the invoice had not been paid, and was on the list of 22 invoices submitted by Trinity to Mr. Verdecia for payment in April.

As discussed above, on April 12, Mr. Verdecia approved 2 Trinity invoices. On April 12, at 11:28 a.m., Mr. Fernandez replied to Ms. Costanzo’s inquiry about payment to Trinity. Mr. Fernandez included Ms. Skroder, Mr. Verdecia, and Ms. Corrales in the email and stated:

Tuesday, April 12, 2016, 11:28 a.m. From: Luis Fernandez. To: Rosa Costanzo; Inger Lisa Skroder; Ernest Verdecia; Diamela Corrales; Victoria Quintero.
<i>Mr. Verdecia is processing the invoices for payment. We apologize for the delay.</i>

Shortly after that message from Mr. Fernandez, Ms. Corrales, unaware of the approvals, replied to Mr. Fernandez, in an email also sent to Mr. Verdecia and Mr. Contreras, with a last-minute plea:

Tuesday, April 12, 2016, 11:31 a.m. From Diamela Corrales. To: Luis Fernandez; Ernest Verdecia; Alejandro Contreras.
<i>Can we please discuss before payment?</i>

Ms. Corrales did not receive a response.

Later that same day, at 3:49 p.m. on Tuesday, April 12, 2016, Mr. Contreras finally responded to Ms. Skroder’s lengthy message sent the previous evening outlining the agreement detailed in the February 18 email. He copied Ms. Costanzo and Ms. Pejdanovska on the email and introduces new provisions to the stipulated business arrangement.

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April 12, 2016, 3:49 p.m.

From Alejandro Contreras To: Inger Lisa Skroder cc: Rosa Costanzo; Maria Pejdanovska

I want to make sure that we are on the same page. I expect that Trinity will bill insurance for patients. If insurance does not cover and we approved they can bill us. We are not a provider and we do not bill.
Jannette- Please schedule urgent call for tomorrow

The cryptic message essentially directs Trinity to first seek compensation from a patient's insurance company. If insurance does not provide air ambulance coverage for the patient – a patient that JHS had approved for inbound transport - then Trinity is authorized to bill JHS. He concludes by emphasizing that JHS will not seek reimbursement from a patient's insurance company, noting the hospital is not a provider of air ambulance service.

A minute later, at 3:50 p.m., Mr. Contreras forwarded the email he had just sent Ms. Skroder to Mr. Verdecia, Ms. Corrales, and Mr. Fernandez. In announcing the way forward, Mr. Contreras does not speak of the invoices he had approved the night before. Importantly, there is no rebuke of the agreement outlined by Ms. Skroder. Instead, Mr. Contreras introduces new provisions to the agreement, suggesting every effort be made to seek payment from insurers before billing JHS.

Mr. Contreras's email of April 12 belies statements he later made to investigators. Mr. Contreras informed the OCE and OIG that there was *no* agreement with Trinity. If that were so, why would he obligate JHS by stating "[i]f insurance does not cover and we approved they can bill us." JHS, as he points out, is "not a provider [of air ambulance services] and we do not bill." Trinity, absent an agreement, would, as any other air ambulance service bringing in a patient to JHS, must collect from the patient, either from the patient's insurance or directly from the patient.

Mr. Contreras, however, was at that point caught in a chain of internal emails that clearly show that the vendor believed to be operating under an agreement to provide inbound air ambulance services. Moreover, he was aware that JHS managers were concerned with paying an air ambulance provider for inbound flights. The email he sent on April 12 appears to be an attempt to reassure JHS staff that private insurance is the primary payor under this agreement, and future invoicing will be limited to those cases when insurance does not cover patients approved for transport.

Mr. Contreras does not attempt to stop the payment of the invoices he had approved the day before on April 11. The 19 approved invoices totaled \$303,635.29 in payments to Trinity for inbound patient transports. Table 4, on the next page, summarizes the approvals of 19 of the 22 invoices submitted by Trinity for inbound patient transports.

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Table 4: Approval of Trinity Invoices

#	Date of Transport	Trinity Invoice #	Amount	Date Approved by Contreras	Date Approved by Verdecia
1	Oct. 17, 2015	15JHS1017YB	\$19,920.00	*	*
2	Jan. 28, 2016	16JHS0128KS	\$10,000.00	*	*
3	Feb. 19, 2016	16JHS0219BH	\$17,254.88		Feb. 25, 2016
4	Feb. 22, 2016	16JHS0222WM	\$15,134.40	*	*
5	Feb. 23, 2016	16JHS00223MZ	\$15,134.40	Apr. 11, 2016	
6	Feb. 27, 2016	16JHS0226GB	\$10,089.00	Apr. 11, 2016	
7	Feb. 28, 2016	16JHS0228LS	\$ 7,185.20		Apr 12, 2016
8	Mar. 4, 2016	16JHS0303AR	\$25,055.00	Apr. 11, 2016	
9	Mar. 7, 2016	16JHS0307GD	\$17,272.50	Apr. 11, 2016	
10	Mar. 8, 2016	16JHS0308DG	\$16,922.50	Apr. 11, 2016	
11	Mar. 8, 2016	16JHS0308SS	\$16,922.50		Apr 12, 2016
12	Mar. 10, 2016	16JHS0310CK	\$16,722.60	Apr. 11, 2016	
13	Mar. 11, 2016	16JHS0311KC	\$ 8,740.50	Apr. 11, 2016	
14	Mar. 11, 2016	16JHS0311DB	\$15,682.10	Apr. 11, 2016	
15	Mar. 11, 2016	16JHS0311JB	\$ 8,673.38	Apr. 11, 2016	
16	Mar. 14, 2016	16JHS0314VP	\$17,159.10	Apr. 11, 2016	
17	Mar. 17, 2016	16JHS0317PA	\$10,675.00	Apr. 11, 2016	
18	Mar. 17, 2016	16JHS0317AA	\$17,632.00	Apr. 11, 2016	
19	Mar. 27, 2016	16JHS0327FV	\$ 6,742.80	Apr. 11, 2016	
20	Mar. 27, 2016	16JHS0327SQ	\$30,904.50	Apr. 11, 2016	
21	Mar. 28, 2016	16JHS0328NM	\$20,201.00	Apr. 11, 2016	
22	Mar. 29, 2016	16JHS0329MS	\$15,999.00	Apr. 11, 2016	

*Although these invoices were on Trinity's list they were not queued in the Lawson system for approval.

C. Extraordinary efforts were undertaken to expeditiously process the payments to Trinity.

Once the invoices were approved for payment, it appears that extraordinary measures were taken to expedite the payments. The processing of all 19 approved invoices for referred patients transported by Trinity was not at all routine. Seven of the invoices from Trinity for referred patients were less than 30 days past due. It appears from the OIG's review of internal emails that every effort was made to rush the payment to the vendor.

In the wake of the financial crisis several years prior, JHS implemented a policy of releasing funds for approved vendor invoices once a week, at the end of each week. This policy was instituted for purposes of maintaining cash-on-hand reserves. Payments are only released off-cycle when personnel intervene on behalf of a particular vendor. The \$303,635.29 paid to Trinity for inbound patient transports was initially transmitted on a Tuesday, April 12, days ahead of the normal payment cycle.

As mentioned earlier, at the time the payments were being processed for the air ambulance services, Trinity had also invoiced for organ transport flights. The amount owed on the organ transport contract totaled \$135,185.30. Due to the extended delays in processing the payments for transporting organs, the staff at MTI were concerned that

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Trinity might suspend vital services. Mr. Alvarez invoked the urgency of the MTI situation in order to expedite payment.

It is clear from a review of emails that on April 11, 2016, there was a concerted effort to pay Trinity not only for the organ transport invoices but for the air ambulance inbound transports. Ms. Costanzo, Mr. Alvarez, and Mr. Contreras coordinated efforts to get the vendor paid. An expedited lump sum electronic transfer payment of \$438,820.59 was issued to Trinity on Tuesday, April 12, 2016. The lump sum payment exceeded the processing capacity of Trinity's bank.

On the morning of April 13, 2016, Ms. Skroder advised that the "electronic system will not allow more than \$99,999.99 per transaction".⁴² The lump sum payment was then rescinded and released in tranches to accommodate the deposit limits at Trinity's bank. Before noon that same day, the staff at Accounts Payable rescinded the bulk payment and issued 6 separate payments in the following amounts: \$88,526.38; 87,633.16; \$84,787.55; \$85,951.80; \$84,736.50; and \$7,185.20. An hour and a half later, Ms. Skroder confirmed the payments had been processed.

D. No effort was made to stop the payments for inbound transports until after the Chief Operating Officer was alerted to the potential regulatory violations.

On or about the morning of April 14, 2016, Mr. Steigman, Chief Operating Officer of JHS, learned about the payments to Trinity for transporting referred patients into JHS facilities. Mr. Steigman could not recall who brought the issue to his attention.

Ms. Corrales who had requested a meeting with Mr. Contreras and Mr. Fernandez prior to payment, recalled walking into the shared office space of Mr. Contreras and Mr. Fernandez to discuss the matter; that may have prompted the escalation of the issue to Mr. Steigman. Mr. Steigman recognized the potential regulatory violations and immediately referred the matter to the OCE.

Mr. Steigman also promptly consulted with the Vice President and Chief Procurement Officer, Ms. Costanzo who responded in writing on the morning of April 14, 2016. Ms. Costanzo included an email attachment outlining the agreement with Trinity, and stated:

⁴² Email. Subject RE: Invoices // Trinity Air Ambulance. From: Inger Lisa Skroder. To: Rosa Costanzo. Cc: 'Maria P'; Fidel Alvarez; Victoria Quintero. Wednesday, April 13, 2016; 9:27 a.m.

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Thursday, April 14, 2016: 9:30 a.m.
From: Rosa Costanzo. To: Don Steigman; Alejandro Contreras

*This information relates to the call this morning. Please see attached.⁴³
Let me know if you need me to communicate with trinity to make a
change to what they have outlined on the attached.*

The notion that it would be incumbent upon JHS to inform Trinity of a change to the procedures for transporting incoming patients into JHS facilities underscores the fact that the procedures as outlined by Trinity had been accepted by the senior JHS officials.

In light of Mr. Steigman's concerns about regulatory violations and his decision to involve the OCE, Ms. Costanzo sought confirmation from her staff that the Trinity air ambulance contract referenced both incoming and outgoing patients. She was informed that Section 2.1 of the RFP noted, "The purpose of this solicitation is to establish a contract for Air Ambulance Services that will be used to transport patients from and to different locations in North America, South America and the Caribbean." The "from and to" language of the RFP, incorporated by reference into the contract, did provide for the possibility of paying a vendor for incoming air ambulance services.

Also, on Thursday, April 14, 2016, the email record indicates a fruitless effort by Mr. Contreras to stop the electronic transfer payments that were made to Trinity. Mr. Contreras emailed the Chief Financial Officer overseeing MTI, Mr. Andrew Figueroa and the Chief Operating Officer of JMH, Mr. Hamilton Clark and stated:

April 14, 2016, 2:07 p.m.
From Alejandro Contreras To: Andrew Figueroa; Hamilton Clark

*Please instruct Accounts Payable not to pay invoices to Trinity until
further notice.*

By the time Mr. Contreras sent that instruction the payments had cleared. It was Mr. Contreras's first attempt to stop payment of the invoices he had approved three days earlier.

In a memo to Mr. Steigman after the OCE investigations were concluded, the OCE summarized Mr. Contreras's recollection: "Alex was later advised by Diamela Corrales that some of the invoices he had approved that day were for inbound patients...Alex recognized the error regarding the payment for inbound transports and immediately called

⁴³ The attachment was Ms. Skroder's February 18 email to Mr. Contreras summarizing the agreement reached and laying out the process.

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Accounts Payable to stop the payment.... He then reported the matter to you [Steigman].”⁴⁴

Mr. Contreras’s account to the OCE is contradicted by the chain of emails. Ms. Corrales’s last-minute plea to discuss the matter before payment, which went unanswered by Mr. Contreras, was made the day after he had approved the invoices. Ms. Corrales, as evidenced by the series of emails discussed above, was trying to figure out why Trinity was billing for inbound transports. More importantly, Ms. Corrales told the OIG that she was not aware payment had been made until she was interviewed by the OCE.

Most significant is Mr. Contreras’ reply to Ms. Skroder’s April 11 email. As part of her plea to get the invoices paid, Ms. Skroder references the February 12 meeting and the resulting agreement:

April 11, 2016, 7:49 p.m. From: Inger Lisa Skroder To: Alejandro Contreras. Cc: Rosa Costanzo; Maria/Trinity.
<p><i>Good Evening Alejandro & Rosa</i></p> <p><i>RE: Contract (RFP 13-11355-CS)</i> <i>On Friday, February 12, 2016, we had a meeting and our Contract (RFP) 13-11355-CS - Air Ambulance Transportation was discussed.</i></p> <p><i>On Thursday, February 18th, 2016, I sent an email to Alex & Maria (Trinity's office manager) advising Maria of what was discussed and agreed upon at our February 12th meeting. ... The procedure as follows:</i></p> <p><i>1.Incoming patients, Trinity will obtain “Financial Clearance” & Acceptance from the Jackson International or Jackson Domestic Department, and then Trinity will transport and then bill Jackson</i></p> <p><i>2.Outgoing patients, Trinity will confirm health insurance coverage (for Subrogation purposes) and then Trinity will transport and then bill Jackson ...</i></p>

Mr. Contreras did not repudiate the agreement in his reply, nor did he attempt to stop the payment, which had not yet been sent. It is clear to the OIG that Mr. Contreras did not take any action to stop payment until after his approvals were the subject of an investigation.

⁴⁴ Memorandum. Subject: Reva From: Judy Ringholz, VP and CCO, Jackson Health System. To: Don Steigman, EVP and COO, Jackson Health System. July 5, 2018.

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Additionally, as soon as Mr. Steigman intervened, Mr. Contreras began seeking information from other JHS executives with access to the financial system. There is an exchange with the Chief Operating Officer of JMH and the Chief Financial Officer overseeing MTI regarding the approval records associated with the Trinity contracts. Mr. Contreras asked:

Friday, April 15, 2016; 7:53 a.m. From: Alejandro Contreras. To: Andrew Figueroa and Hamilton Clark.
<i>Can you check on system and see the levels of approval. You indicated I approve some, can you tell me the levels prior to me.</i>

Mr. Figueroa, the CFO of MTI responded:

Friday, April 15, 2016; 9:06 a.m. From: Andrew Figueroa To: Alejandro Contreras
<i>I just spoke to Vicky of AP. She confirms that only 1 level of approval is required for PO-driven invoices under \$1M.</i>

As the OCE began to investigate, Mr. Contreras knew for certain that no other personnel in the JHS system would have been involved in the review and approval process. He alone would appear in the financial records as approving the bulk of the invoices.

Despite knowing these facts, when interviewed by the OIG, Mr. Contreras initially suggested that Mr. Verdecia would have reviewed invoices, then the Lawson system would transmit the invoices to him for approval. Upon further questioning and reflection, Mr. Contreras abandoned this misdirection and explained that the OCE had informed him that Procurement had processed the invoices to him directly.

Before the end of the week when the payments were made, an order to stop any future inbound patient referrals from Trinity was issued. Mr. Contreras sent a message to Ms. Skroder declaring:

Friday, April 15, 2016, 3:26 p.m. From: Alejandro Contreras To: Inger Lisa Skroder. Cc: Ernest Verdecia; Diamela Corrales.
<i>Please be advised that Jackson Health System will only be responsible for outbound flights from our facilities, as approved by our transportation departments</i>

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Ms. Skroder reacted to this change of policy by asking Ms. Costanzo:

Friday, April 15, 2016, 3:45 p.m. From Inger Lisa Skroder. To: Rosa Costanzo. Cc: Maria P.

<i>Will there be an amendment to the contract now?</i>
--

There would be no amendment forthcoming to legitimize this improper partnership between JHS and Trinity to increase the inbound patient traffic into JHS. On the contrary, future bid specifications would be prepared to ensure JHS did not have a contractual vehicle to pay for inbound patient referral transports. The next competitive bid for patient air ambulance services was scoped to expressly limit the use of the contract to the transportation of patients out of JHS facilities – outbound only.⁴⁵

VIII. SUBSEQUENT EFFORTS TO RECOUP PAYMENTS AND RESOLVE COMPLIANCE ISSUES

Having been requested to review the payments to Trinity, the OCE requested that Ms. Laura Hunter, the Vice President for Business Development with oversight of the International Division, chair a meeting with Trinity. The meeting was scheduled on June 10, 2016, in the West Wing of Jackson Memorial Hospital, conference room 126B. At the meeting, numerous officials from JHS, including Mr. Contreras were present. The purpose of the meeting was to advise Trinity of the potential compliance issue and to seek its cooperation in refunding the contractual payments made by JHS.

According to Ms. Skroder, she was confounded by the request that Trinity should refund the payments received for services rendered to JHS. From her perspective, Trinity had performed services according to the procedures outlined in communications with JHS and in accordance with the terms of the contract (RFP 11355-CS).

In her statement to the OIG, Ms. Hunter recalled an “escalation” during an exchange between Mr. Contreras and Ms. Skroder. Mr. Contreras asserted there was never an understanding between the parties, “and that’s when they started to argue” Ms. Hunter had to restore order. The meeting dissolved without any clear resolution of the potential compliance issue. According to Ms. Hunter, what did become obvious through the process was that “we do not pay for referrals from any organization and we are not a transportation provider.”

⁴⁵ RFP 16-14339-SS Air Ambulance Services. Cost Center 99202. Don Steigman, VP assigned. Medway Air Ambulance (Primary) and REVA, Inc. (Secondary). Awarded 6/15/2017 Three-year term.

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An emphatic message to quit referring patients had been delivered to the vendor, but the “potential compliance issue” associated with the past payments had not yet been resolved.⁴⁶ The next step was to send a formal letter demanding Trinity refund the payments. That letter was sent to Trinity on October 11, 2016, under the signature of Mr. Contreras. Trinity did not respond to this appeal from Mr. Contreras to *“remit all inappropriately invoiced funds within 30 days of this notice, approximately \$303,635.29.”*⁴⁷

Trinity advised the OIG they had no intention of incurring the expense of having legal counsel discuss this matter with attorney’s representing JHS. As a practical matter, if Trinity were to refund the payments, the vendor would then have to negotiate with multiple insurance carriers, including Medicaid and Medicare, to recover the costs of the air ambulance services paid by JHS.⁴⁸ After receiving no response for several months, a second demand letter was sent to Trinity on January 13, 2017. Trinity did not reply to this letter from Mr. Contreras, either.

During the aforementioned August 18, 2017, meeting requested by the OIG in order to obtain a status on the demand letters, Chief Financial Officer Mark Knight made the statement that it is not the policy of JHS to pay for inbound transports. The OIG responded by noting that since Trinity was not likely to return any of the payments, JHS had, in fact, paid for inbound transports.

After the meeting, in September of 2017, CFO Knight instructed JHS staff to identify patients transported into JHS by Trinity whose care was billed to federal payors. Eleven patients were identified.⁴⁹ Mr. Knight instructed his employees to refund only the portion of the payments covered by federal payors. Based upon the instructions and criteria provided by Mr. Knight, JHS eventually refunded a total of \$641,234.06 in fees for the eleven patients.

When asked by the OIG, who was involved in the decision to reimburse the federal payors, Mr. Knight forthrightly declared, *“I was involved in that decision. There was ongoing discussion about whether this was a compliance issue or not. I think this triggers some Kickback or Stark or some regulation. And, the investigation, as you probably know*

⁴⁶ Trinity advised the OIG that, as it relates to the specific issues associated with air ambulance transportation payments for patients insured by federal insurers, Trinity had never rendered services as a Medicaid or Medicare provider and was not interested in developing that line of business.

⁴⁷ Inexplicably, JHS paid an additional invoice to Trinity for an inbound patient exactly 30 days after issuing the Demand Letter seeking the return of “inappropriate” payments.

⁴⁸ It is important to note that Trinity had been paid for these services based on the negotiated contract rates guaranteed in the contract with JHS (RFP 13-11355-CS). For international flights, Trinity was paid \$3865 / Flight Hours for jet service, along with additional fees for medical support staff, if needed, and \$880 / landing fees.

⁴⁹ The list contained 1 patient who had been transported into JHS by Trinity in June of 2015, before the patient referral activities began.

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better than I, went on entirely too long. So, this happened in '16 and in '17 we still did not know the answer." He explained that Medicare and/or Medicaid allows a provider to "rebill" within 12 to 13 months after a payment is received. Mr. Knight noted these adjustments, if done timely, are done "mechanically" without "triggering a red flag." So, in an abundance of caution, Mr. Knight chose to go ahead and refund the payments, without the need to explain the reason for returning the billed revenues to the federal payors.⁵⁰

The reimbursements were intended to remove from the books the earnings derived from referred patients who were covered by federal payors. However, JHS kept the revenues generated by the referral-patients who had private insurance or were self-paying. Trinity provided air ambulance for ten financially cleared patients who did not rely upon federal payors. Based upon information provided by the CFO, the fees JHS collected for these ten patients totaled \$525,162.35. Perhaps this category of referrals does not expose JHS to federal compliance issues, but a question about the ethics of securing revenues through patient referrals remains.

The financial impact of this episode on the taxpayer supported institution has been significant. There was the payment of \$303,635.29 to a vendor for services that should have been paid by the patient or the patient's insurance company. And then, after patients are treated, the hospital returned \$641,234.06 in payments received for the services rendered.⁵¹ The net loss to the hospital in hard currency is **\$944,869.35**.

IX. RECOMMENDATIONS

Based on the OIG's findings we make the following recommendations:

1. JHS and OCE reconsider disclosing the Trinity proposal, inbound transports, and related payments to HHS-OIG.
2. JHS provide and document training to JHS staff, including senior management and department directors, on the Anti-kickback Statute, the Civil Monetary Penalties Law, and other federal regulations to ensure compliance with legal requirements.
3. Establish a procedure to ensure that vendor initiatives and proposals are vetted, and due diligence, such as communicating with user departmental directors to

⁵⁰ Though the CFO indicated JHS did not want to raise any "red flags," there did not appear to be an urgency to submit the funds within the 12-13 month window following the receipt of funds.

⁵¹ The selected reimbursements do not align exactly with the Trinity patient referral transports.

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determine any potential issues or pitfalls, is conducted prior to acting on such proposals.

X. RESPONSES TO THE DRAFT REPORT AND OIG REBUTTAL

This report as a draft was provided to Mr. Carlos A. Migoya, President and Chief Executive Officer of JHS, Mr. Alejandro Contreras, Ms. Rosa Costanzo, Mr. Ernest Verdecia, Mr. Fidel Alvarez, Ms. Judy Ringholz, Mr. Mark Knight, and Ms. Inger Lisa Skroder of Trinity for their review and the opportunity to provide a written response. The OIG did not receive a response from Ms. Skroder. The OIG received a single response on behalf of JHS, it is attached as Appendix B.

The OIG received JHS's formal response several weeks prior to the onset of the Covid-19 pandemic. The response, authored by Ms. Ringholz, asserted that JHS was taking steps to implement processes and procedures in line with the OIG recommendations numbered 2 and 3 above. Specifically, Ms. Ringholz stated that the OCE is and would continue to provide general and focused compliance training. In addition, Ms. Ringholz stated that the OCE is working on formalizing a process and incorporating it into policy to ensure that "the OCE is included in selection committee meetings for proposals that involve referral sources." Regarding the OIG's first recommendation, that JHS consider self-disclosure of this matter to HHS-OIG, Ms. Ringholz, on behalf of JHS, stated that self-disclosure "is not warranted, nor would it be appropriate." That conclusion was based upon an assessment of the OIG report by the law firm of Hooper, Lundy & Bookman, P.C. (HLB).

The OIG requested and received HLB's 33-page memorandum detailing its review and conclusions, it is attached as Appendix C. HLB based its conclusion and advice to JHS upon facts gleaned from reviewing the OIG draft report and exhibits, materials prepared by OCE, and interviews conducted by HLB of JHS personnel. HLB did not interview anyone at Trinity.

HLB's memo states that "[a]pplying these facts to law, we cannot conclude that JHS and Trinity entered into an arrangement in violation of AKS" (HLB memo p.28). The OIG is concerned with the chosen facts applied by HLB that led to this conclusion. The facts as presented by HLB in its memorandum, are incomplete and erroneous. The OIG believes that JHS cannot make an accurate determination of its course of action if important facts are missing from the analysis. Additionally, if facts are either mischaracterized or misunderstood, the conclusion is equally unreliable. More importantly, because HLB conducted interviews of key JHS personnel, including Mr. Contreras, additional facts

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elicited during those interviews serve to heighten the OIG's conclusion that JHS should self-disclose.

Principally, through HLB's interview of Mr. Contreras it is now clear that "...he understood that what Trinity had proposed was problematic from a compliance perspective" (HLB memo p.28). Mr. Contreras advised HLB that at the very first meeting with Trinity "...he understood the nature of what Ms. Skroder was proposing and he thought that the proposal 'didn't sound right.' Mr. Contreras said that he 'clearly knew' that 'what they were referring to was something that we couldn't do as a health system. We couldn't pay someone to bring us patients'" (HLB memo p.9). That affirmative statement of knowledge serves to bolster the evidence adduced by the OIG investigation. It is also clear, based on the HLB interview of Mr. Contreras, that the proposal by Trinity could potentially personally benefit Mr. Contreras.

The OIG did not know nor inquire about any potential personal motivations Mr. Contreras may have had for the advancement of the venture with Trinity. HLB did inquire of Mr. Contreras, who stated that "...only a tiny portion of his compensation was based on increased revenue, and that his incentive compensation was based in larger part on separate factors" (HLB memo pp.15-16). In a matter of weeks, the inbound transportation scheme brought new revenues to the hospital, as evidenced by the refund of \$641,234.06 to federal payors alone. Had the activity continued, the formula for rewarding Mr. Contreras his incentive pay may have been very substantial. Although it seems on its face, that even a "tiny" increase in compensation might provide motivation, HLB nevertheless concludes that "...Mr. Contreras had no financial motivation to cause JHS to pay Trinity for inbound transport of international patients" (HLB memo p.31).

Those two facts – that Mr. Contreras had knowledge of the impropriety of the venture and that he had some personal motivation – are sufficient facts to call into question HLB's conclusion. There are, however, other facts that HLB did not consider, overlooked, or simply misunderstood. This rebuttal will only address the more critical lapses in HLB's memo, it is not a point by point response. There remains the very real possibility that a different conclusion may have been drawn had a more precise and germane compilation of facts been applied to the law. Principally, HLB concludes that 1) JHS did not agree to Trinity's proposal, as evidenced by the fact that the contract was never amended, and 2) that the approval of Trinity invoices on April 11 was done in error (HLB memo p.27).

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A. HLB's analysis and conclusion regarding the agreement.

HLB begins with the factually incorrect statement that “[t]he OIG makes a number of conclusions and assertions, including that JHS agreed to amend the contract...” (HLB memo p.2). There is no such statement or conclusion by the OIG to be found anywhere in the OIG Report. In fact, the OIG Report makes clear that there was no need to amend the contract to carry out the referral scheme. While Trinity did ask about amending the contract in order to provide a 24/7/365 Transportation Call Center and enter into a marketing services agreement for air service and hospitalization for Trinity’s clients, Trinity ultimately outlined a program that did not require any contract amendments to cover inbound transports.

It is clear from the emails and the statements obtained by the OIG that Trinity proposed to bring in patients for JHS and receive payment from JHS. That is indisputably what happened. While the first in-person meeting was attended by Mr. Contreras and Ms. Costanzo, Mr. Contreras was the only one from JHS at the February 12 in-person meeting with Trinity. At that meeting, Trinity, as evidenced by its written contemporaneous emails, reached an agreement on how to accomplish the new venture. Undisputed by the OIG is the fact that Mr. Contreras did not acknowledge the agreement in writing. However, the fact that Mr. Contreras failed to reply to that email does not mean that an agreement was not reached. His failure to respond in writing should be re-examined by JHS in light of his statement to HLB that he “...understood that what Trinity had proposed was problematic from a compliance perspective” (HLB memo p.28) and that it “was something that we couldn’t do as a health system” (HLB memo p.9).

The cornerstone of HLB’s conclusion that the parties, Trinity and JHS, did not have an agreement is that the contract was never amended. HLB cites to contract law for the proposition that “silence does not constitute acceptance of an offer...” (HLB memo p.30) implying that Mr. Contreras’s failure to respond in writing to the proposal did not amend the contract nor constitute an agreement. HLB conflates not amending the contract with not accepting the proposal. The former might well necessitate a written agreement, but the latter, the agreement to pay for a referral of a patient, does not have to be and most likely would not be reduced to writing.

In fact, the inbound transport payment to secondary vendor REVA, which triggered Trinity’s proposal, established that the existing contracts allowed for such payments. The communications from Trinity outlining the standard operating procedures to be followed to maximize the utilization of the existing contract were sent to Mr. Contreras. The OIG also notes that Mr. Contreras was routinely copied on invoices submitted from Trinity for inbound patients, simultaneously with its submission to GHX, the third-party processor, and others authorized to review or approve transportation code 99202 invoices. The

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undisputed facts are that the inbound transportation services were provided, billed, and paid without a contract amendment. The OIG re-iterates its assertion that Trinity's initiative to transport patients into JHS and bill the Air Ambulance contract was done with the knowledge and acquiescence of two JHS Vice Presidents.

HLB refutes this assertion stating that in the first meeting Mr. Contreras informed Trinity that JHS did not agree to the Trinity proposal, which was corroborated by Ms. Costanzo. It should be noted that the OIG never concluded that an agreement was reached after that first meeting. Nevertheless, HLB's assertion is a mischaracterization of the testimony referenced in its own memorandum. HLB writes "...Mr. Contreras recalls that, in response to Ms. Skroder's proposal, he stated that 'we will continue to follow our standard policies for transportation.' Ms. Costanzo was the other JHS representative at this meeting. Ms. Costanzo corroborated that no one from JHS agreed to amend the contract" (HLB memo p.9).

Mr. Contreras's statement is not a statement rejecting the proposal, as the "standard policies for transportation" afforded an opportunity for JHS to pay for transporting an inbound patient. Further, the corroboration offered by Ms. Costanzo is not that Mr. Contreras rejected the proposal, only that "no one from JHS agreed to amend the contract." HLB's mischaracterization of its own facts is important, as it points to HLB's repeated insistence that the never amended contract is proof of a lack of agreement.

HLB does not cite, and the OIG is not aware of, any communications from or to Mr. Contreras indicating his beliefs about the status of the contract. However, it is clear from the emails reviewed that as early as March 8, 2016, Mr. Contreras knew the scheme was operational without any contract amendments. There is no record to be found to indicate Mr. Contreras made any attempt to inform Trinity that JHS was not accepting its proposal. Mr. Contreras received email after email from Trinity regarding the proposal to maximize the use of the contract and increase business for JHS and never indicated the proposal was not being accepted.

The OIG report makes clear that Mr. Contreras was presented with the proposed operating procedures to effectuate this scheme, entirely within the bounds of the existing contract, and never intervened. After the vendor sent proposed operating procedures to Mr. Contreras, as stated in our report, there is no record of an email reply from Mr. Contreras to counter or challenge the vendor's understanding of the process to follow.

Another declaration without factual support by HLB is "...JHS's refusal to agree to the proposed agreement..."(HLB memo p.9). The OIG never found any evidence of JHS's refusal to participate in the proposed scheme. Had there been a clear refusal at any point in the development of this arrangement, the PHT would not have paid hundreds of thousands of dollars on illicit transports. On February 18, Trinity sent Mr. Contreras a

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detailed example of how this patient referral scheme would work using the contracted rates within the existing agreement; Mr. Contreras did not send a reply to that email.

Mr. Contreras offers HLB a new explanation of why he did not respond to the February 18 email from Trinity. First, and most important, it should be noted that in prior interviews, Mr. Contreras flatly denied he ever read the email in question until after the impropriety of the payments had come to light. Although HLB's memo does not directly state that Mr. Contreras read the email, the inference is that he did; HLB writes: "When asked why he did not respond [to the February 18 email], and if he was concerned that Trinity would act unilaterally to alter the JHS-Trinity arrangement, he stated that, in the first meeting, he believed he had communicated "very clearly" to Trinity that JHS would follow the system's normal practices. He added that, having gone through the RFP process, he thought that Trinity would understand that any modification would have to be in writing and go through a similar process." This is clearly another reason that JHS should re-consider accepting HLB's advice. JHS should have a complete record and understanding of Mr. Contreras's statements. JHS should review the notes, transcript, or other record of HLB's interview of Mr. Contreras. If indeed Mr. Contreras admitted reading the February 18 email, then HLB's analysis and conclusion should be further questioned.

HLB does express "...concerns about certain statements made by Mr. Contreras during the various inquiries related to this matter" (HLB memo p.27.) HLB notes that "... on multiple occasions, Mr. Contreras informed JHS and Trinity personnel that "[i]f insurance does not pay we need to" (HLB memo p.27). During HLB's interview of Mr. Contreras he explained "...that what he had in mind was a situation where the request for inbound transport was initiated by JHS; in that context, he believe[d] that if the patient's insurance does not cover the cost of the transport, it is appropriate for JHS to figure out a way to pay the difference" (HLB memo p.28). HLB notes that:

"[h]owever, here Trinity was demanding payment of air ambulance invoices for transport of international patients. There is nothing in the underlying emails suggesting that JHS initiated the request. Rather, this occurred in the context of Trinity making repeated requests over the prior three months to change the contract, so it is unclear why Mr. Contreras would apply his general understanding that JHS should pay if a patient's insurance did not to this context. Moreover, Mr. Contreras stated to us that he understood that what Trinity had proposed was problematic from a compliance perspective. If he understood this, it is unclear why Mr. Contreras would believe that JHS should ever pay any portion of the inbound transport fee to the provider, even if JHS requested the transport" (HLB memo p.28) (Emphasis in the original).

Clearly HLB understands that Mr. Contreras's explanation, particularly considering his knowledge of the inappropriateness of the venture, is not an adequate explanation.

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Nevertheless, HLB puts aside those concerns and concluded that “[n]otwithstanding these concerns, the evidence indicates that Mr. Contreras never agreed with or accepted Trinity’s proposal, and the contract was never amended by anyone at JHS. There was no ‘meeting of the minds’” (HLB memo p.28).

HLB overlooks a key fact contained in the OIG report—the contract did not need to be amended because it allowed for transports “from and to” JHS facilities. The JHS Chief Procurement Officer confirmed, after the payments were made, that the contract referenced both incoming and outgoing patients. Section 2.1 of the RFP noted, “[t]he purpose of this solicitation is to establish a contract for Air Ambulance Services that will be used to transport patients from and to different locations...” The “from and to” language of the RFP, incorporated by reference into the contract, did provide for the possibility of paying a vendor for incoming air ambulance services without the need to amend the contract.⁵² HLB’s analysis includes no mention of the “from and to” provision allowing for incoming transports. The OIG Report, not only mentions the provision allowing inbound and outbound, it also explains that JHS took steps to ensure there was no future contractual vehicle to pay for inbound patient transports by limiting the next competitive bid for air ambulance services to the “outbound only” transportation of patients from JHS facilities.

HLB’s analysis not only fails to consider the provisions of the contract, but also overlooks a key email between Ms. Costanzo and Mr. Contreras that clearly reveals an understanding of the agreement. The email also makes clear the intended purpose of transporting patients to JHS – to maintain a competitive advantage over other regional hospitals. On April 8, before the payments are issued to Trinity, and while Mr. Verdecia is questioning the invoices, Ms. Costanzo writes to Mr. Contreras: *“I understand. I’m sorry to bother you with it. I was not asking you to process. I understand you are a SVP in our system. I wanted to share it with you because I feel that he [Mr. Verdecia] is not understanding the bigger picture on how we need to move quickly to have the patients come here instead of our competition. We turn them away and Broward and Baptist pick them up quickly”* (Emphasis added).

Not only does HLB’s memo fail to consider the email evincing Ms. Costanzo’s and Mr. Contreras’s understanding of the agreement, HLB asserts that Mr. Contreras “stymied” Trinity. On March 8, 2016, Trinity’s office administrator sent Mr. Contreras an invoice for a patient brought into JHS. Mr. Contreras replies, “I do not process invoices.” When interviewed by HLB he stated he believed “that Trinity was attempting to ‘bypass’ JHS’s normal procedures...” (HLB memo p.12). Again, this is an explanation that should not have been accepted by HLB. There are no “normal procedures” within JHS to intake

⁵² Article 25 of the Air Ambulance Agreement incorporates by reference the RFP.

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patients being referred by a vendor. Yet HLB concludes that “[s]tymied by Mr. Contreras, Trinity turned to Mr. Verdecia” (HLB memo p.12).

The OIG notes that Mr. Contreras certainly did not “stymie” the vendor’s efforts to further this scheme. After receiving the invoice on March 8, Mr. Contreras did not hinder or prevent eleven (11) more referral patients from being transported into JHS facilities by Trinity. Further, his “concerning” responses in emails (that insurance must pay, and that Trinity must follow normal procedures) appear to be attempts to distance himself from any record of the process. Considering his statement to HLB that he understood this “was something that we couldn’t do as a health system”, (HLB memo p.9) it becomes clear that Mr. Contreras would not be endorsing the referrals in writing.

After reviewing HLB’s memo, it is even clearer that this vendor-initiated program was launched with the knowledge and acquiescence of the Senior Vice President and Chief Administrative Officer of JHS, Mr. Contreras.

B. HLB’s analysis and conclusion regarding the approval of the invoices.

In addition to overlooking the knowledge of the scheme and its impropriety, HLB also concludes “...that the evidence reflects that, on the day in question, the Trinity invoices were approved erroneously, rather than ‘knowingly and willfully...’” (HLB memo p.2). To reach this conclusion HLB ignores important facts and conflates the need for payment of the organ transport invoices with the Air Ambulance invoices. HLB characterizes the approval of the invoices as “...a series of unfortunate events” (HLB memo p.2). It indeed was unfortunate that the invoices were approved, but they were not mistakenly approved.

HLB writes that “Trinity successfully bypassed the normal invoice review process, elevating the matter to the Chief Administrative Officer. The matter reached Mr. Contreras’ desk late in the day on his birthday, and he approved the invoices in haste, without careful review. There is no evidence that he intended to pay Trinity for inbound transports” (HLB memo p.2). HLB reports that Mr. Contreras stated he “didn’t want to deal with them (Trinity) anymore” and “that he had many responsibilities besides transportation, and that responsibility for transportation was being transitioned at the time to Luis Fernandez” (HLB memo p.10).

The OIG notes that at the time of that transition, when as he states, Mr. Contreras did not want to deal with Trinity, that was in fact when Mr. Contreras was first added as an approver of transportation invoices. On March 8, 2016, Mr. Contreras truthfully advised Trinity that he did “not process invoices.” HLB’s conclusion that the invoices were elevated to the Chief Administrative Officer by a pushy vendor is wrong for several reasons. It is incorrect because it assumes the approval could just be elevated to

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management regardless of that manager's ability to approve for a specified department. More importantly, it ignores that Mr. Contreras, whose responsibilities over transportation were indeed being transitioned, nevertheless acquired the authority to approve transportation invoices shortly after that exchange with Trinity. On March 21, 2016, Mr. Contreras's status was changed to "Invoice Reviewer" and "Invoice Approver" in the JHS Lawson system. HLB's memo is silent as to that late grant of authority.

Also, the invoices were never "elevated" to Mr. Contreras. He was designated with the same review and approval authority in the Lawson system as Mr. Verdecia, Director of Transportation Services; either one of them could have approved the invoices as of March 21, 2016. The very first time Mr. Contreras knowingly exercised his newfound authority to process transportation invoices was to approve inbound invoices from Trinity on April 11, 2016.

Even more troubling than HLB's disregard of the late grant of approval authority to Mr. Contreras, is HLB's insistence that the approvals were mistaken; particularly considering Mr. Contreras's varying accounts of how he came to approve the invoices. Mr. Contreras has been consistently untruthful about the first invoice he approved that day. Every invoice he approved on April 11, 2016, was for an inbound patient referred by Trinity. Yet, he told the OCE that the first invoice he approved was "not for an inbound patient", and then explained that he carelessly approved the others thinking they were all the same. He told the OIG that the first invoice he reviewed may have been for an ambulance company providing ground transportation, not an inbound air transport, and similarly stated he approved the rest thinking they were all the same. Finally, he told HLB the first invoice he reviewed was for regular transportation, "...meaning that it was not for an international air ambulance transport, and that it looked fine to him, so he approved that invoice as well as all others from Trinity that day" (HLB memo p.27).

HLB's memo acknowledges that "[w]e cannot reconcile Mr. Contreras' statements with the documentation that was provided to him on April 11th" (HLB memo p.27). The memo also notes that HLB "... cannot reconcile some of Mr. Contreras' statements made regarding these events with the evidence. For instance, Mr. Contreras has stated repeatedly that, on the day in question, he reviewed one of the Trinity invoices sent to him, that it was for local, rather than international, transport, and that it seemed in order, so he approved all of the Trinity invoices. We have been unable to identify any transportation invoices sent to Mr. Contreras on April 11th except for the Trinity invoices for inbound transport of international patients" (HLB memo p.3). HLB points out that "[I]ike the OIG, we reviewed the invoices that were sent to Mr. Contreras for approval on April 11th, and we did not identify any invoices for local transportation; the only transportation invoices were the Trinity Air Ambulance invoices for inbound transport of international patients" (HLB memo p.27).

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In stating that “[n]evertheless, we do not believe that Mr. Contreras intended to approve the invoices in question...” (HLB memo p.3). HLB chooses to disregard the evidence of Mr. Contreras’s actions approving the invoices as well as his prevarications. In addition, HLB fails to acknowledge the email correspondence between Mr. Alvarez and Mr. Contreras which speaks to the willfulness of Mr. Contreras’s actions. After approving 16 invoices in a row, Mr. Contreras writes: “I think I got them all. I have nothing in my inbox or coming in. My Bday today so I am leaving now. I waited but I am not getting anything more.” In addition, one business day before he approved the 16 invoices for Trinity, Mr. Contreras advised senior administrators working on the Trinity matter, “if insurance does not pay we need to.” The OIG stands by its conclusion that Mr. Contreras “knowingly and willingly” approved the invoices.

HLB also conflates the need to approve the organ transport invoices with the transportation invoices, overlooking a key email that makes it clear that the two sets of invoices were separate matters sent to separate approvers. HLB writes that “[b]y threatening to halt organ transport, Trinity successfully bypassed the normal invoice review process, elevating the matter to the Chief Administrative Officer” (HLB memo p.2). This assertion is simply not correct.

Trinity was the secondary vendor on the organ transport contract. There is no evidence Trinity, as the secondary, back-up provider of organ air services, could “halt organ transport.” Trinity might have been able to halt its services as the secondary provider, clearly an action that JHS may have sought to prevent, but HLB exaggerates the threat. HLB then incorrectly asserts that the alleged threat resulted in a bypass of the normal invoice review process resulting in Mr. Contreras’s approval of the Air Ambulance invoices.

This version of events disregards the fact that Mr. Alvarez actively assisted the approval process of both the organ transport invoices and the Air Ambulance invoices by shepherding each through the separate administrators responsible for each contract’s approval. It seems clear from HLB’s memo that at the time of its interview with Mr. Alvarez there was some confusion as to the events. HLB writes, “Mr. Alvarez did not recall if he checked the invoices [sent to Mr. Contreras] to make sure that they were for organ transport, but he assumed that they were” (HLB memo p.15). The OIG does not have the benefit of a transcription or report of HLB’s full interview of Mr. Alvarez to understand the context of that statement. HLB, however, did have the OIG’s Report and all the emails that could have been reviewed by Mr. Alvarez to refresh his recollection. It is clear from the contemporaneous emails that Mr. Alvarez knew that the urgency was related to the organ contract and that he did not send Mr. Contreras any organ transport invoices.

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Mr. Alvarez sends the team that can assist with the organ contract an email on April 11 stating: *"Team, I am giving you guys a heads up we will need to make a payment for this vendor today... I am trying to get all the emergency forms signed and invoices approved so that it can be processed, but we will need a check cut today, Sorry don't kill the messenger. This vendor is threatening to stop their services and this is for transplant we won't be able to pick up organs."* Mr. Contreras is not sent that email, was not asked to assist, nor was he sent any invoices relating to the organ transport invoices.

HLB overlooks that Mr. Alvarez, who was also aware of the outstanding Air Ambulance contract invoices, sent those separately to Mr. Contreras. After the Air Ambulance invoices are transmitted to Mr. Contreras, Mr. Alvarez sends an email to Trinity stating: *"...we are also working on getting the other pending invoices that are related to po 8108421 SERV [the Air Ambulance invoices] paid. Ill [sic] keep you posted tomorrow."* Clearly, the invoices approved by Mr. Contreras were not elevated to him, bypassing the normal review process, and he was deliberately sent only the Air Ambulance invoices, which he could at the time approve. It is not only the contemporaneous emails, but the actual separate transactions and separate approval process that HLB disregards in conflating Mr. Contreras's approval of the transportation invoices with the approval of the organ contract invoices.

The OIG reasserts that it is clear from a review of emails that on April 11, 2016, there was a concerted effort to pay Trinity not only for the organ transport invoices but for the Air Ambulance inbound transports. The payments were not a mistake, they were not as HLB states "approved in error." The OIG finds ample evidence that Mr. Contreras intentionally approved the invoices for Trinity and has been untruthful on multiple occasions in his attempt to excuse his actions – there was no "regular" invoice in the series of inbound Air Ambulance invoices he approved.

HLB also suggests there was a sequence of reflection, self-awareness, and corrective steps by Mr. Contreras that supports the notion that the approval of the invoices was an honest mistake. HLB writes, that "...upon realizing his mistake, Mr. Contreras took steps to rectify the error" (HLB memo p.2). This assertion by HLB sidesteps the very facts elicited during its own investigation. HLB references a meeting involving Diamela Corrales and Mr. Contreras that took place on April 12 or 13. "Over the course of these interactions with Ms. Corrales, Mr. Contreras realized that he had mistakenly approved these invoices on April 11th" (HLB memo p.17). Assuming it is true that Mr. Contreras realized on April 12 or 13 that he had approved hundreds of thousands of dollars of illicit invoices, it does not explain why he would take no action to stop the payments to Trinity until the afternoon of April 14, 2016. By that time, the electronic payments had cleared Trinity's bank.

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More significant is HLB's failure to mention the fact that on April 12, Mr. Contreras responded to a Trinity email laying out the agreement and took no steps to stop the payment. On April 11, after Mr. Contreras approved the invoices, but before payment, Trinity sent an email demanding payment. That email not only referenced the agreement as first memorialized by Trinity in its February 18 email to Mr. Contreras, but it attached the February 18 email. Mr. Contreras does not, after receiving and responding to that email, take any action to rescind the payments he had just approved. Nor does Mr. Contreras notify senior JHS officials at that time. HLB's analysis is simply deficient in not addressing Mr. Contreras's clear knowledge of the agreement and invoice approvals prior to the actual disbursement of funds to Trinity.

HLB makes the claim that it "was Mr. Contreras who notified the COO about the payments" (HLB memo p.3). The OIG notes that the notion that Mr. Contreras notified the COO contradicts his earlier statement to the OCE, that he attempted to stop the payments first and then reported the matter to Mr. Steigman. What is undisputed is that Mr. Steigman knew of the situation early on the morning on April 14, 2016, and that Mr. Contreras sent his email about stopping payments to Trinity later that afternoon. Mr. Steigman could not recall who brought the issue to his attention when interviewed by the OIG. Without an independent confirmation, the representation by Mr. Contreras that he was the person who informed Mr. Steigman of this activity remains in doubt.

HLB takes issue with the OIG's conclusion that "there were no efforts to stop the payments until the Chief Operating Officer of JHS was alerted to the improprieties" and states that "[t]he insinuation is that Mr. Contreras intentionally failed to make efforts to stop the payments until he was instructed to do so by Mr. Steigman" (HLB memo p.31). There is no disputing the timeline of events as established by the email evidence. It is not until after Mr. Steigman is aware of the matter, that Mr. Contreras issues an email instructing "Accounts Payable not to pay invoices to Trinity until further notice." HLB does not offer any evidence, nor did the OIG find any evidence, that Mr. Contreras attempted to stop the payments or rectify the matter before the COO, Mr. Steigman, learned of the situation.

There are many other errors of fact and analysis throughout the HLB memorandum. This rebuttal has only highlighted the principal errors that the OIG believes should give JHS pause in accepting HLB's recommendation. The OIG is concerned that the "record" that HLB is relying upon to make its conclusion is flawed. The decision of the PHT to exercise its option under the Self-Disclosure Protocol rests entirely with the PHT, and that decision warrants full consideration of clear facts.

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XI. CONCLUSION

The OCE conducted two separate investigations that concluded there was no wrongdoing on the part of JHS. The factual underpinnings supporting the conclusion were that:

- the patient-referral activity was the result of a misunderstanding between the parties on which Trinity moved unilaterally and
- that the ensuing payments were unintentional.

In a July 5, 2018, recitation of the incident, the OCE asserts the following:

“...[B]ased upon the findings of two internal investigations, there is no evidence that is indicative of unlawful conduct by any JHS employee pertaining to the payments described above. Neither the Anti-kickback Statute nor the Civil Monetary Penalties Law is a strict liability law. This means that the individual(s) at issue must have intended to provide something of value in exchange for referrals of business (i.e. patient transports) or to induce patients to select JHS over another facility, in order to have broken the law. There is no evidence to suggest that such was the case with regard to these payments.”⁵³

Based on the OCE’s conclusion, JHS determined no disclosure of a federal violation was necessary to HHS-OIG.

The OIG review found that contrary to the OCE findings, a vendor-initiated program to transport patients into JHS paid under an existing Air Ambulance contract was launched with the knowledge and acquiescence of two senior JHS officers. The acquiescence is evident given the various email communications from the vendor that clearly propose inbound flights, the documented meetings held on at least two occasions, and a lack of communication to the vendor that such a proposal violates policy. The absence of a clear and decisive repudiation of the proposal by the JHS officials resulted in Trinity transporting patients into JHS for which JHS paid. The bulk of the payments were knowingly and intentionally approved by Mr. Contreras.

The OIG found that the deference shown to senior JHS officials by the OCE resulted in unfounded conclusions. For example, the OCE interview notes for both Mr. Contreras and Ms. Costanzo read the same: “...*claims “no intent” to induce referrals.*”⁵⁴ There is no explanation offered to support that conclusion. Also, there are clearly contradictory statements made by Mr. Contreras that went unchallenged. For example, Mr. Contreras stated he did “not agree that it was understood we [Trinity and JHS] had an agreement”

⁵³ Memo To: Don Steigman From Judy Ringholz, dated July 5, 2018.

⁵⁴ OCE Notes of Interview, April 26, 2016.

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and also stated that he was aware Ms. Skroder had an impression that “he would authorize payments for any international patients they transported.”⁵⁵

Based on the OIG’s review of records and email communications, it does not appear that the OCE could have reviewed *all* the relevant records. Had the OCE reviewed all the internal communications, independent of its interviews of senior JHS officials, its investigation would have yielded clear evidence that the parties met on two occasions, discussed the inbound transportation to be paid under the contract, and at least one senior JHS official expressed a clear intent to pay for the inbound flights.

Similarly, HLB’s review does not account for several key email communications and overlooks inconsistencies in statements. The OIG is not persuaded by HLB’s opinion as explained in its memorandum. The OIG’s comprehensive investigation supports a different conclusion. In accordance with Section 2-1076 of the Code of Miami-Dade County, the OIG will share this Final Report with HHS-OIG.

⁵⁵ OCE Notes of Interview, July 19, 2017.

Miami-Dade County Office of the Inspector General

Exhibit 1

**Demand Letters and attachments
dated October 11, 2016, and
January 13, 2017**

(5 pages)

OIG Case No. 18-0005-O



ALEJANDRO CONTRERAS, SVP
Operations, JHS

Executive Office
West Wing 108
1611 NW 12th Avenue
Miami, Florida 33136-1094
Phone: 305-585-6200

October 11, 2016

Inger-Lisa Skroder
Trinity Air Ambulance International, LLC
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308

Re: Trinity Invoices

Dear Ms. Inger-Lisa Skroder:


As discussed in our meeting on June 10, 2016 and in subsequent conversations with you, the Public Health Trust ("PHT") has been inappropriately billed for air ambulance services provided by Trinity Air Ambulance International, LLC ("Trinity"). See Attachment A. On twenty occasions, pursuant to an inappropriate bill from Trinity, the PHT made a payment to Trinity for inbound (i.e., an individual was transported to a PHT facility) air ambulance transportation services. As we discussed at length in our June 10, 2016 meeting and in subsequent phone calls, according to the Medicare Billing Manual, Medicare Claims Processing Manual, Chapter 15-Ambulance, Trinity is identified as a "Supplier," and as such, Trinity should have billed the individuals' insurance directly. See Attachment B.

We have made the offer, on several occasions, for Trinity's attorney to speak to the PHT's counsel in order to more fully understand the legal and regulatory obligations at issue. The PHT's offer still stands, and we encourage you to reach out.

Attached is a list reflecting payment of Trinity's twenty-two invoices for inbound individuals (Attachment A), Trinity's twenty-two invoice for inbound individuals Attachment B), and PHT invoices reflecting taxes removed from payment of Trinity's invoices. See Attachment C. The PHT is demanding that Trinity immediately remit all inappropriately invoiced funds within 30 days of this notice, approximately \$303,635.29.

I appreciate your cooperation in the matter.

Sincerely,



Alejandro Contreras, SVP
Senior Vice President

Jackson Health/ Trinity Air Ambulance Meeting

June 10th, 2016, 1:00pm – 2:30pm
West Wing 126B, Jackson Memorial Hospital

AGENDA

- I. PURPOSE
- II. COMPLIANCE REQUIREMENTS
- III. CONTRACT
- IV. INVOICES
- V. OTHER

**JACKSON HEALTH SYSTEM
TRINITY AIR AMBULANCE MEETING**

West Wing 126B

June 10, 2016

Attendees

JACKSON HEALTH SYSTEM

Cheryl Wagonhurst - Compliance Program Oversight

Fernandez, Luis – Director of Operations JHS

Verdecia, Ernest – Project Manager Medical Transport

~~Costanzo, Rosa M – VP Strategic Sourcing~~ – Carlos Scull.

Custer, Lori L - Corporate Director of Auditing, Monitoring and Investigation ✓

Contreras, Alejandro E – SVP Operations

Paige, Peter G - CMO Jackson Health System

Tawwater, John – AVP Risk Management, Patient Safety, Claims, CDPI Transfer

Hunter, Laura – SVP Business Development

TRINITY AIR AMBULANCE

Maria Pejdanovska - 'maria@trinityairambulance.com'; - 954-771-7911

Inger Lisa Skroder - 'ingerlisa@trinityairambulance.com' – Mobile: 305-205-0570

PRM-FR-CHECK-D	PRM-TO-CHECK-I	Vendor-2	Vendor Name-2	APP-INVOICE-2	Invoice Date-2	Payment Date-2	Payment Number-2	APP-TRAN-PMT-AMT-6	APP-TRAN-CHK-AMT-6	PHT/OIG Tax	API-VOUCHER-NBR-2
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS06188L	6/19/2015	7/27/2015	2002219	15562.2	15562.2	-350.15	10242540
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS02198H	2/19/2016	4/13/2016	2003133	17254.88	17254.88	-388.24	15017656
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS0223MZ	2/24/2016	4/13/2016	2003133	15134.4	15134.4	-340.53	15018789
37165	42513	104364	TRINITY AIR AMBULANCE	16JHS0227G8	42433	42473	2003133	10089	10089	-227	15018794
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS0304AR	3/7/2016	4/13/2016	2003134	25055	25055	-563.74	15018772
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS0307GD	3/8/2016	4/13/2016	2003134	17272.5	17272.5	-345.45	15018793
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS0308DG	3/8/2016	4/13/2016	2003134	16922.5	16922.5	-380.76	15018773
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS0308SS	3/8/2016	4/13/2016	2003135	16922.5	16922.5	-380.76	15018813
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS0310CK	3/9/2016	4/13/2016	2003135	16772.6	16772.6	-377.38	15018774
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS0311DB	3/9/2016	4/13/2016	2003135	15682.1	15682.1	-352.85	15018775
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS0311JB	3/14/2016	4/13/2016	2003134	8673.38	8673.38	-195.15	15018776
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS0311KC	2/29/2016	4/13/2016	2003135	8740.5	8740.5	-196.66	15018777
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS0314VP	3/14/2016	4/13/2016	2003135	17159.1	17159.1	-386.08	15018778
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS0317AA	3/18/2016	4/13/2016	2003136	17632	17632	-396.72	15018779
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS0317PA	3/17/2016	4/13/2016	2003135	10675	10675	-240.19	15018780
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS0327FV	3/28/2016	4/13/2016	2003132	6742.8	6742.8	-151.72	15018781
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS0327SQ	3/28/2016	4/13/2016	2003136	30904.5	30904.5	-695.35	15018782
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS0328NM	3/29/2016	4/13/2016	2003136	20201	20201	-454.52	15018783
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS0329MS	3/29/2016	4/13/2016	2003136	15999	15999	-359.98	15018784
10/1/2001	5/23/2016	104364	TRINITY AIR AMBULANCE	16JHS0228LS	3/8/2016	4/13/2016	2003137	7185.2	7185.2	-161.66	15018814

\$	310,580.16	\$	(6,944.89)
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Total Paid:	\$	303,635.27
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Executive Office
West Wing 108
1611 NW 12th Avenue
Miami, Florida 33136-1094
Office: 305-585-6200

ALEJANDRO CONTRERAS, SVP
Operations, JHS

January 13, 2017

Inger-Lisa Skroder
Trinity Air Ambulance International, LLC
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308

Re: Trinity Invoices

Dear Ms. Skroder,

In a letter dated October 11, 2016 and signed by me, the PHT demanded that Trinity immediately remit all inappropriately invoiced funds that were paid to Trinity by the PHT pursuant to twenty-two (22) invoices for transporting inbound individuals. Three months have passed and Trinity has not responded to the PHT's demand for repayment.

Please provide contact information for Trinity's corporate attorney, in a reply to this letter, by January 20, 2017.

Sincerely,

A handwritten signature in black ink, appearing to read "Alejandro Contreras".

Alejandro Contreras, SVP
Jackson Health System

**Miami-Dade County
Office of the Inspector General**

Exhibit 2

**OCE Summary of Investigation Pertaining to Air Ambulance Matter
dated August 18, 2017
(3 pages)**

OIG Case No. 18-0005-O

TO: File for Compliance 360 Incident #0020049

FROM: Judy Ringholz, Vice President of Compliance and Ethics & Chief Compliance Officer
Raul G. Ordonez, Director of Compliance

DATE: August 18, 2017

RE: Summary of Investigation Pertaining to Air Ambulance Matter

INTRODUCTION

The purpose of this report is to briefly ¹summarize the facts related to two internal investigations of the matter identified as Compliance 360 Incident #002049 and the findings of these investigations. These investigations, which were related to payment for inbound patient transports, were conducted by the Office of Compliance and Ethics.

BACKGROUND FACTS

In Fall of 2013, Jackson Health System ("JHS") issued a Request for Proposals ("RFP") for "Air Ambulance Services". (See Attachment A).

In April 2014, at the conclusion of the RFP process, JHS selected Trinity Air Ambulance International, LLC ("Trinity") as the primary RFP awardee, and Reva Air Ambulance as the secondary awardee. JHS and Trinity executed an agreement (PHT RFP NO.: 13-11355-CS) on April 16, 2014 ("Agreement"). (See Attachment B).

In early 2016, a misunderstanding between the parties resulted in Trinity acting on an arrangement they had proposed, with the expectation that they would be paid for inbound transports, while JHS was not aware that Trinity was acting on a proposal that it had not accepted.

Between February 19, 2016 and March 29, 2016, Trinity transported twenty (20) patients from outside the US to Jackson Memorial Hospital or Jackson North Medical Center. In each case, JHS International Patient Services performed a financial assessment to confirm that the incoming patient was insured and obtained medical clearance from a JHS accepting physician. In March and April of 2016, Trinity sent twenty (20) invoices to JHS for the transports they performed during the period described above. On April 13, 2016, JHS paid nineteen (19) of those invoices.

The JHS leader who approved the payment explained that he only reviewed the first invoice, which was not for an inbound patient, and he approved all invoices in the batch. When it was brought to his attention that he had approved payments on invoices that were for transports of inbound patients, he reached out to the CFO at JMH and others in Finance in an effort to stop the payment before a check was processed, but he learned that the payment had been made by credit card (P-card).

¹ This summary does not include descriptions of all documents that were reviewed or interviews that were conducted. The purpose of this document is to summarize information that was discovered during the course of this investigation.

Once it was realized that payment was made on invoices that were for inbound patients, this matter was made known to JHS' Office of Compliance and Ethics ("OCE") and an internal investigation was commenced. On April 15, 2016, Trinity was informed, via email, that JHS would only be (financially) responsible for outbound flights. This was reiterated in an email that was sent to Trinity by JHS four days later. It was suggested to Trinity that they could bill the patients' and/or their insurance companies for inbound transportation, and it was noted that JHS, as a provider, could not bill for the air ambulance services.

On June 10, 2016, several of JHS' senior leaders met with Trinity's owners to discuss this matter and attempt to reach a resolution. It was explained, once again, that Trinity, as an air ambulance supplier, could bill the patients or the patients' insurance directly. However, as a provider, JHS could not bill for the air ambulance services that were rendered by Trinity. This being the case, JHS asked Trinity to refund the payments it had made to Trinity for inbound transports and seek payment from the patients and/or their insurance companies. This was well within the time period during which Trinity could bill the appropriate parties. However, Trinity's owners would not engage in this discussion. Rather, they attempted to use the meeting as an opportunity to air their grievances with JHS related to various other operational issues.

On October 11, 2016, JHS sent a letter to Trinity reaffirming the request for repayment that was made during the June 10th meeting. (See, Attachment C.) On January 13, 2017, JHS sent a second letter reiterating the request for repayment and requesting contact information for Trinity's attorney. On April 27, 2017, JHS sent an email to Trinity reiterating the request for contact information for their attorney. (See Attachments D and E, respectively.) Trinity has refused to communicate with JHS regarding this matter.

METHODOLOGY OF REVIEW

The OCE's initial investigation, conducted between April and June 2016, consisted of interviews of JHS senior leaders, a review of internal email communications, as well as those between the parties, and a review of all relevant records to confirm that the transports were medically necessary. When Trinity had not responded to JHS' repeated attempts at communication and resolution by April 2017, a subsequent investigation was conducted by the OCE, so that findings could be confirmed, a final determination could be made, and this matter could be resolved. Senior leaders were interviewed a second time by the new leaders in the OCE. Additional emails were reviewed, the International communication logs for each of the twenty (20) patient transfers were examined again, and a detailed medical necessity review was performed. In addition, OCE reviewed the accounts receivable reports from Trinity between April 2016 and July 2017 (of which there were none).

ANALYSIS & CONCLUSION

On balance, the evidence led the OCE to conclude that there was no wrongdoing on the part of JHS. The original purpose of the Agreement was founded in a legitimate business need. Low utilization of the services during the first twenty-one months that the agreement was in effect is consistent with the absence of any intent by the parties to generate additional business. The OCE did not find any evidence that JHS accepted Trinity's proposal, which included billing JHS for inbound transports,

and no addendum or modification to the agreement was executed. Finally, the investigation revealed that payment for nineteen inbound patients was made by mistake.

The OCE performed a detailed review of the communications between Trinity and JHS for each of the inbound transports. In each case, Trinity informed the JHS International Services Department that they were bringing an international patient to JHS. JHS International Services then obtained medical and financial clearances. There was no evidence of any communications by JHS to induce a patient to choose JHS rather than another provider.

CORRECTIVE ACTION

The OCE routinely approved all payments before they were made to air ambulance vendors for a period of time following these events and will continue to monitor such payments on an intermittent basis to ensure that controls that were implemented remain effective.

REQUEST FOR REPAYMENT

JHS maintains that Trinity should have billed the inbound patients and/or their insurance companies for the transports described herein, given that JHS cannot bill for air ambulance transport services, and this was made known to Trinity well within the window of time when they could have billed the appropriate parties. Since there appears to have been no wrongdoing on the part of JHS, the decision whether or not to pursue repayment is a business decision, and the OCE will close this file.

**Miami-Dade County
Office of the Inspector General**

Appendix A

Referenced emails

(Redacted in accordance with 42 U.S.C. §1320d et.seq.)

OIG Case No. 18-0005-O

From: RCostanz@jhsmiami.org
Sent: Wednesday, February 10, 2016 9:22 AM
To: IBattle@jhsmiami.org; Pedro.Alfaro@jhsmiami.org; Ernest.Verdecia@jhsmiami.org
Subject: FW: Jackson Contract - circumventing
Attachments: Sam Ruiz - Jackson Hospital / Trinity Air Ambulance / Tallahassee to Miami Case; 29DEC2015 1625PM Incoming Maria and Sam from JMHS about if we accept Med....wav; 29DEC2015 1713PM Incoming call from Sam advising Alina name of Medicaidwav; 29DEC2015 1742PM Outgoing Alina and Sam from JHMS asking the fees for JM....wav

As requested during the call today.

Rosa M. Costanzo, CMRP, CPPB, CPSM
VP/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096
Telephone: (305) 585-7333
Facsimile: (305) 585-1412
RCostanz@jhsmiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

From: Costanzo, Rosa M
Sent: Thursday, January 07, 2016 12:07 PM
To: 'Trinity Air Ambulance - Maria'; Verdecia, Ernest; Scull, Carlos
Cc: Figueroa, Andrew J; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance'; 'Tor Skroder'; 'Lars Skroder'; Romano, Michelle A
Subject: RE: Jackson Contract - circumventing

Maria- The Project champion for this contact is Ernest Verdecia. It is important that these concerns get addressed with him for improved communications and possible resolution.
These concerns need to be brought to his attention in a timely manner. Ernest is the lead on this contract utilization and performance.

Ernest- Please review attached documents and follow up as needed.
I recommend you all meet and discuss once you have had an opportunity to review the attached audios and email below.

Thank you
Rosa M. Costanzo, CMRP, CPPB, CPSM
VP/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096

Telephone: (305) 585-7333
Facsimile: (305) 585-1412
RCostanz@jhsmiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Tuesday, January 05, 2016 9:55 AM
To: Costanzo, Rosa M
Cc: Figueroa, Andrew J; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance'; 'Tor Skroder'; 'Lars Skroder'; maria@trinityairambulance.com
Subject: RE: Jackson Contract - circumventing

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Tuesday, January 05, 2016 9:43 AM
To: 'Costanzo, Rosa M'
Cc: Andrew J. Figueroa; maria@trinityairambulance.com; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance'; 'Tor Skroder'; 'Lars Skroder'
Subject: RE: Jackson Contract - circumventing
Importance: High

Good Afternoon & Happy New Year Rosa,

This is regarding the current air ambulance contract that we have with Jackson as primary Ernest- attached are emails I have received from Trinity that require your attention and follow up as the project champion on this contract.

Below is a summary of the calls and email correspondence that occurred on Tuesday, December 29th and Wednesday, December 30th, 2015.

On December 29th, 2015 at 16:25:54 PM, was the first initial called received from Sam Ruiz of Jackson regarding a potential case for patient K [REDACTED] D. S [REDACTED]. When Sam called, I, Maria, took the call. Sam asked if we would accept Medicaid regarding a potential case out of Tallahassee, Florida. Please find attached the audio of the call "29Dec2015 1625PM...". At no time did Sam Ruiz mention that Jackson would be covering the flight for this transport. We were only asked if we could take Medicaid for the transport.

On December 29th, 2015 at 17:13pm my colleague Alina received a call Sam Ruiz and he was going to provide her with the contact information for the Medicaid case manager, Glenique, but Alina had already determined the case manager's name and contact and was on the other line with Glenique. Please find attached audio recording "29DEC2015 1713PM..."

On December 29th 2015 at 17:52pm Alina sent an email to Sam advising that Medicaid will not be able to provide GOP until the following day, December 30th, once the case manager, Glenique, returns to the office. Please see attached email that was sent to Mr. Sam Ruiz. "Sam Ruiz – Jackson Hospital / Trinity Air Ambulance /....." The email specifically stated *'We can do the transfer tonight if we have a secured payment, via credit card from the family'* To be noted, Sam Ruiz never replied to Alina's email.

Please note that at no time was Trinity advised that Jackson would guarantee payment for this transport to Trinity nor that this request for air ambulance transport is under our current contract.

The only time that we found out that Jackson was proving guarantee of payment was the following day on December 30th at 09:24am when Sam was called. Prior to Sam speaking to Trinity, he can be overheard stating that *"Ernie was not available so I signed it and faxed it to...."* When Sam started talking with Lisa & Alina, of Trinity, and Sam was asked if

"Jackson provided a guarantee of payment to REVA" he answered "Right" and then said "maybe".... However, his conversation at the start of the Audio suggested that "Ernie was not available so I signed it and faxed it" I would assume that statement was an authorization for REVA! (see attached audio "Alina and Lisa with SAM from JHMS".)

Then a call was made to Ernie. Ernie stated that Trinity refused transport. Please note that Trinity NEVER declined transport. We advised that " We can do the transport tonight", per our email to Sam Ruiz. Regarding funding, our email, see attached email, specifically states that "if we have a secured payment, via credit card from the family". Trinity never asked for credit card from Jackson. Sam never replied to our email stating whether or not the family would be able to pay or whether Jackson would cover it. Ernie stated that Trinity refused patient transport and delayed transport. If this was true, then why didn't REVA fly in the evening of Dec 29th ? Trinity was available on the evening of Dec 29th ! (this audio will be sent in a separate email as it is too big to add to this email)

In summary: Trinity was available for this transport on December 29th and we could have completed this transport in the evening on December 29th had we known that Jackson would guarantee payment of this transport as under our current contract and not having to wait for the following day to receive coverage and GOP from Medicaid. However, it appears that REVA was selected to do the transport in the am of Dec 30th and no one from Jackson advised Trinity. Trinity continued to seek a payment guarantee from the insurance in the am of December 30th.

Why was this information that Jackson will guarantee payment for this transport never disclosed to Trinity ?

Our contract commenced April 15, 2014 and it was projected that there would be total of \$ 1,018,571.00 billed to Jackson under Purchase Order 8108421-0-SERV. To date it has been 21 months since inception of the contract and we have had only FIVE transport requests and the total billed to Jackson is \$ 76,899.16. After this case and experience, I can only assume that the balance of the air ambulance trips are being diverted to REVA!

We would like to have a meeting with you to discuss how we can ensure that air ambulance trips are given to Trinity as per the contract. In addition, we are seeking a cancellation fee & lost revenue for this mission.

Please advise what dates and times you are available to meet after you review the attached audios and email.

Attachments of voice recordings will be sent separately in a following email as the size of the files exceeds the limit of this email.

Kind Regards,

Maria Pejdanovska
Trinity Air Ambulance International, LLC
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308

Ph: 954-771-7911
Fax: 954-771-4882



Email: Maria@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com



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From: Costanzo, Rosa M [<mailto:RCostanz@jhsmiami.org>]
Sent: Wednesday, December 30, 2015 10:12 AM
To: 'Inger Lisa Skroder - Trinity Air Ambulance'; Scull, Carlos; Verdecia, Ernest
Cc: 'Maria@trinityairambulance.com'; 'Tor Leif Erik Skroder'; Figueroa, Andrew J; Kimmelman, Gila L; Romano, Michelle A; Perez-Dickens, Maggy (Transplant); Contreras, Alejandro E
Subject: RE: Jackson Contract - circumventing

Carlos and Ernie-

Please review. I made a mistake, I don't believe this is related to transplant.

Thank you
Rosa

-----Original Message-----

From: Costanzo, Rosa M
Sent: Wednesday, December 30, 2015 10:03 AM Eastern Standard Time
To: 'Inger Lisa Skroder - Trinity Air Ambulance'
Cc: ; Tor Leif Erik Skroder; Figueroa, Andrew J; Kimmelman, Gila L; Romano, Michelle A; Perez-Dickens, Maggy (Transplant)
Subject: RE: Jackson Contract - circumventing

Inger-Lisa

Thank you for this note. I will have this reviewed and a meeting scheduled.

Wishing you a very Prosperous, Healthy and Happy New Year.

Rosa M. Costanzo, CMRP, CPPB, CPSM
VP/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096
Telephone: (305) 585-7333
Facsimile: (305) 585-1412
RCostanz@jhsmiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance [<mailto:IngerLisa@TrinityAirAmbulance.com>]

Sent: Wednesday, December 30, 2015 9:48 AM

To: Costanzo, Rosa M

Cc: Maria@trinityairambulance.com; Tor Leif Erik Skroder; Figueroa, Andrew J

Subject: Jackson Contract - circumventing

Rosa

Can you advise when we can meet to discuss our contract for air ambulance ? We are available next week, anytime.

Again, we have a situation whereby Jackson personnel is circumventing the system and hiring Reva instead of Trinity. Today Jackson is utilizing Reva for a patient transfer from Tallahassee Memorial - patient name is Kingston David Stuart ("Mosier").

Please note that Trinity will be seeking lost trip revenue.

Have a nice New Year.

Let me know a date and time we can meet.

Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

From: Inger Lisa Skroder - Trinity Air Ambulance International
<IngerLisa@TrinityAirAmbulance.com>
Sent: Thursday, January 7, 2016 5:34 PM
To: Costanzo, Rosa M
Cc: 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance'
Subject: Rosa: Re: Cleveland Clinic's new venture

Hi Rosa

Further to our call, here is the link to the information on the Cleveland Clinic in Weston.

They just recently got "licensed" as an air ambulance provider with the state on December 15, 2015. Their provider number is AIR7020.

<https://appsmqa.doh.state.fl.us/MQASearchServices/HealthCareProviders/LicenseVerification?LicInd=110&ProCde=2603&org=Cleveland%20Clinic%20Florida%20Health%20System%20Nonprofit%20Corporation%20>

The Cleveland Clinic is contracted with an air carrier for their planes- just like how we are contracted with Jackson.

I believe that with our current contract and an amendment, we could offer the same "deal" that Cleveland Clinic is planning to offer to potential clients – in order to increase their transfers to themselves. The CC has also partnered with Miami Children's to try and cover neonates & peds.

I know that we (JHS & Trinity) would be able bring more clients directly to the Jackson Health System. JHS has FULL capabilities to manage any patient, unlike the CC.

Let me know if you would like to discuss further the possibilities.

Best regards,
Inger Lisa

License Verification

[Printer Friendly Version](#)

Cleveland Clinic Florida Health System Nonprofit Corporation

License Number: AIR7020

Data As Of 1/6/2016

- [License Information](#)
- [Secondary Locations](#)
- [Discipline/Admin Action](#)
- [Supervising Practitioners](#)
- [Subordinate Practitioners](#)

Profession
EMS Service Provider Air
License
AIR7020
License Status
Clear/
Qualifications
Interfacility
License Expiration Date
12/15/2017
License Original Issue Date
12/16/2015
Address of Record
3100 Weston Road
WESTON, FL 33331
UNITED STATES
Discipline on File
No

×

Public Complaint Definition

Public Complaint - A public complaint (administrative complaint) is not disciplinary action. It is a charging document that has not been proven. A public administrative complaint is the result of a complaint and the investigation of the allegation of a violation of the practice act that governs a health care profession. The administrative complaint lists the violations of law that were alleged after the investigation and review that resulted in a finding of probable cause.

By law, the administrative complaint becomes public 10 days after a finding of probable cause or when the licensee waives the privilege of confidentiality. Every administrative complaint is reviewed by the appropriate licensing board, or the department if there is no board, as one step in the hearing process that provides the subject of the complaint with due process of law. Some public administrative complaints are dismissed at the hearing stage. Other administrative complaints result in disciplinary action imposed by a final order, which is reflected as a "YES" in the "Discipline on File" entry on the licensee verification screen.

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License Status Definitions

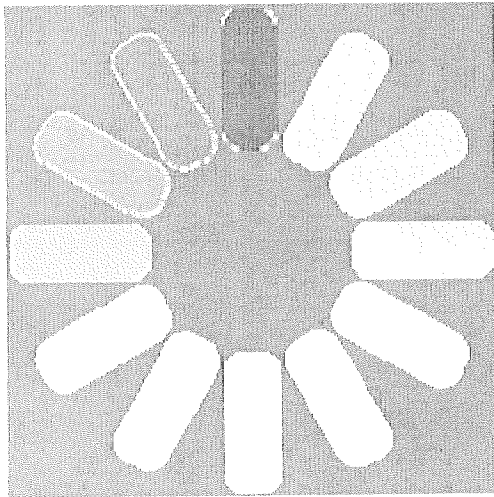
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Controlled Substance Prescriber Definition

Controlled Substance Prescriber - In accordance with s. 456.44, Florida Statutes, a physician licensed under chapter 458, chapter 459, chapter 461, or chapter 466 who prescribes any controlled substance, listed in Schedule II, Schedule III, or Schedule IV as defined in s. 893.03, for the treatment of chronic nonmalignant pain, must designate himself or herself as a controlled substance prescribing practitioner on the physician's practitioner profile.

"Chronic nonmalignant pain" means pain unrelated to cancer which persists beyond the usual course of disease or the injury that is the cause of the pain or more than 90 days after surgery.

Address
5280 NW 20th Terrace hanger #58 Ft. Lauderdale Executive Airport
FT LAUDERDALE, FL 33309



Name	Profession	License	Effective Date
ROUHANI, MAZYAR	Medical Doctor	<u>83806</u>	12/16/2015

Click on the License Number to view License Details for that Practitioner

Name	Profession	License	Effective Date
N691ES	Vehicle Permit (Aircraft)	<u>1819</u>	12/16/2015
N980AG	Vehicle Permit (Aircraft)	<u>1820</u>	12/16/2015

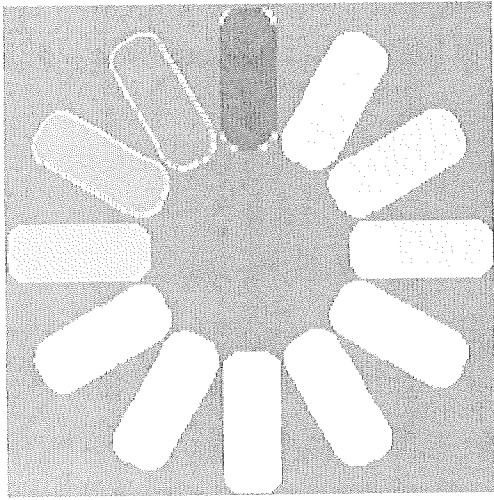
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No Continuing Education Hours Received from Approved Providers As Of 1/7/2016

* To find out more about Approved Providers, or ask a provider why the course you took is not yet listed, please visit our [Continuing Education Providers](#) page.

** Personal Development is limited to no more than 3 hours per renewal cycle. Any personal development hours in excess of this 3 hour maximum cannot be used for renewal and have been subtracted from the total available for renewal.

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Back

For instructions on how to request a license certification of your Florida license to be sent to another state from the Florida Department of Health, please visit the [License Certifications web page](#).

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882



Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com



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Costanzo, Rosa M

From: Costanzo, Rosa M
Sent: Friday, January 08, 2016 10:50 AM
To: Romano, Michelle A
Subject: FW: Rosa: Re: Cleveland Clinic's new venture

FYI

From: Contreras, Alejandro E
Sent: Thursday, January 07, 2016 6:00 PM
To: Costanzo, Rosa M
Cc: Verdecia, Ernest
Subject: RE: Rosa: Re: Cleveland Clinic's new venture

Yes we need to. Can you please

From: Costanzo, Rosa M
Sent: Thursday, January 7, 2016 5:58 PM
To: Contreras, Alejandro E <Alejandro.Contreras@ihsmiami.org>
Subject: FW: Rosa: Re: Cleveland Clinic's new venture

Alex,

Our existing primary air ambulance vendor under RFP 13-11355-CS, Trinity, has brought this information to my attention. It may be worthwhile to meet with them.

If you would like me to schedule a meeting please let me know.

Thank you
Rosa

From: Inger Lisa Skroder - Trinity Air Ambulance International [<mailto:IngerLisa@TrinityAirAmbulance.com>]
Sent: Thursday, January 07, 2016 5:34 PM
To: Costanzo, Rosa M

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Hi Rosa

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I know that we (JHS & Trinity) would be able bring more clients directly to the Jackson Health System. JHS has FULL capabilities to manage any patient, unlike the CC.

Let me know if you would like to discuss further the possibilities.

Best regards,
Inger Lisa

License Verification

Printer Friendly Version

Cleveland Clinic Florida Health System Nonprofit Corporation

License Number: AIR7020

Data As Of 1/6/2016

- License Information

- Secondary Locations
- Discipline/Admin Action
- Supervising Practitioners
- Subordinate Practitioners

Profession

EMS Service Provider Air

License

AIR7020

License Status

Clear/

Qualifications

Interfacility

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12/15/2017

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12/16/2015

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UNITED STATES

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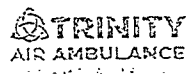


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Inger Lisa

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- Subordinate Practitioners

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Public Complaint - A public complaint (administrative complaint) is not disciplinary action. It is a charging document that has not been proven. A public administrative complaint is the result of a complaint and the investigation of the allegation of a violation of the practice act that governs a health care profession. The administrative complaint lists the violations of law that were alleged after the investigation and review that resulted in a finding of probable cause.

By law, the administrative complaint becomes public 10 days after a finding of probable cause or when the licensee waives the privilege of confidentiality. Every administrative complaint is reviewed by the appropriate licensing board, or the department if there is no board, as one step in the hearing process that provides the subject of the complaint with due process of law. Some public administrative complaints are dismissed at the hearing stage. Other administrative complaints result in disciplinary action imposed by a final order, which is reflected as a "YES" in the "Discipline on File" entry on the licensee verification screen.

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License Status Definitions

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Controlled Substance Prescriber Definition

Controlled Substance Prescriber - In accordance with s. 456.44, Florida Statutes, a physician licensed under chapter 458, chapter 459, chapter 461, or chapter 466 who prescribes any controlled substance, listed in Schedule II, Schedule III, or Schedule IV as defined in s. 893.03, for the treatment of chronic nonmalignant pain, must designate himself or herself as a controlled substance prescribing practitioner on the physician's practitioner profile.

"Chronic nonmalignant pain" means pain unrelated to cancer which persists beyond the usual course of disease or the injury that is the cause of the pain or more than 90 days after surgery.

Address

5280 NW 20th Terrace hanger #58 Ft. Lauderdale Executive Airport
FT LAUDERDALE, FL 33309



Name	Profession	License	Effective Date
ROUHANI, MAZYAR	Medical Doctor	<u>83806</u>	12/16/2015

Click on the License Number to view License Details for that Practitioner

Name	Profession	License	Effective Date
N691ES	Vehicle Permit (Aircraft)	<u>1819</u>	12/16/2015
N980AG	Vehicle Permit (Aircraft)	<u>1820</u>	12/16/2015

Click on the License Number to view License Details for that Practitioner

No Continuing Education Hours Received from Approved Providers As Of 1/7/2016

* To find out more about Approved Providers, or ask a provider why the course you took is not yet listed, please visit our [Continuing Education Providers](#) page.

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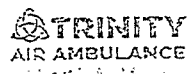


Back

For instructions on how to request a license certification of your Florida license to be sent to another state from the Florida Department of Health, [please visit the License Certifications web page.](#)

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882



Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com



From: Costanzo, Rosa M <RCostanz@jhsmiami.org>
Sent: Wednesday, February 10, 2016 9:28 AM
To: Contreras, Alejandro E
Cc: Romano, Michelle A
Subject: FW: Rosa: Trinity Air Ambulance - 24/7/365 Air Ambulance Transportation Call Center

FYI-I don't think I had shared this communication.

Rosa M. Costanzo, CMRP, CPPB, CPSM
VP/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096
Telephone: (305) 585-7333
Facsimile: (305) 585-1412
RCostanz@jhsmiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

From: Inger Lisa Skroder - Trinity Air Ambulance International [mailto:IngerLisa@TrinityAirAmbulance.com]
Sent: Wednesday, January 27, 2016 1:17 PM
To: Costanzo, Rosa M
Cc: 'Trinity Air Ambulance - Maria'
Subject: RE: Rosa: Trinity Air Ambulance - 24/7/365 Air Ambulance Transportation Call Center

Hi Rosa

Thank you for setting up the meeting with your colleagues at JHS last week. Further to our meeting, I have put together the following list of how this venture would work. Take a look at it and we can discuss further. Let me know when you want to get together again.

Addendum to RFP No. RFP-13-11355-CS Air Ambulance Services

Jackson Health System 24/7/365 Air Ambulance Transportation Call Center

Partners: Jackson Health System (JHS) - Trinity Air Ambulance International (Trinity)

- Trinity will provide a dedicated "24/7/365 Transportation Call Center and dedicated line for all incoming flight & transfer calls.
- Trinity will offer bed to bed transfer to JHS
- If client is a direct client of Trinity's, Trinity will collect coordination fee and bill Jackson per contracted AA.
- If client is a Jackson negotiated partner, Jackson will bill directly to client and collect. Trinity will bill Jackson per contracted AA rate.
- JHS and Trinity to market services of air and hospitalization to Trinity's clients

Point of Call Procedure

1. Trinity will receive call from potential client, obtain Medical Information, Patient Demographics, Patient's Primary and Secondary Insurance.
2. Trinity will make contact with Jackson International or Jackson Transfer Center to provide Patient information, as above in # 1, for verifying health insurance coverage & acceptance to Jackson facilities.
3. Once patient is cleared for acceptance and financial clearance, Trinity will finalize transport and perform mission. Trinity will provide JHS with patient status and ETA to JHS facility.

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882



Email: IngerLisa@TrinityAirAmbulance.com

Website: www.TrinityAirAmbulance.com



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From: Legon, Jeanine [<mailto:Jeanine.Legon@jhs-miami.org>]

Sent: Friday, January 08, 2016 2:00 PM

To: 'Trinity Air Ambulance - Maria'; 'Inger Lisa Skroder - Trinity Air Ambulance International'

Subject: RE: Rosa: Re: Cleveland Clinic's new venture

My pleasure ☺

Respectfully,

Jeanine Legón, BA

Executive Assistant to

Rosa M. Costanzo, CMRP, CPPB, CPSM

Vice President, Strategic Sourcing & Supply Chain Management/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096
Telephone: (305) 585-7333
Facsimile: (305) 585-1412
Jeanine.Legon@jhsmiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Friday, January 08, 2016 1:52 PM
To: Legon, Jeanine; 'Inger Lisa Skroder - Trinity Air Ambulance International'
Cc: maria@trinityairambulance.com
Subject: RE: Rosa: Re: Cleveland Clinic's new venture

Thank you very much Jeanine.

Kind Regards,

Maria Pejdanovska
Trinity Air Ambulance International, LLC
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308

Ph: 954-771-7911
Fax: 954-771-4882



Email: Maria@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com



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From: Legon, Jeanine [<mailto:Jeanine.Legon@jhsmiami.org>]
Sent: Friday, January 08, 2016 1:51 PM
To: 'Trinity Air Ambulance - Maria'; 'Inger Lisa Skroder - Trinity Air Ambulance International'
Subject: RE: Rosa: Re: Cleveland Clinic's new venture

1611 NW 12 Avenue, Miami, Florida 33136

1st Floor of the hospital, by the hospital gift shop.

Respectfully,

Jeanine Legón, BA

Executive Assistant to

Rosa M. Costanzo, CMRP, CPPB, CPSM

Vice President, Strategic Sourcing & Supply Chain Management/ Chief Procurement Officer

Jackson Health System

Jackson Medical Towers

1500 NW 12 Avenue - Suite 820

Miami, Florida 33136-1096

Telephone: (305) 585-7333

Facsimile: (305) 585-1412

Jeanine.Legon@jhsmiami.org

Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Friday, January 08, 2016 1:41 PM
To: Legon, Jeanine; 'Inger Lisa Skroder - Trinity Air Ambulance International'
Cc: maria@trinityairambulance.com
Subject: RE: Rosa: Re: Cleveland Clinic's new venture

Jeanine,

Can you please provide us the exact address and the floor number.

Kind Regards,

Maria Pejdanovska

Trinity Air Ambulance International, LLC

3535 Galt Ocean Drive

Fort Lauderdale, Florida 33308

Ph: 954-771-7911

Fax: 954-771-4882



Email: Maria@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com



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From: Legon, Jeanine [<mailto:Jeanine.Legon@jhsiami.org>]
Sent: Friday, January 08, 2016 1:45 PM
To: 'Inger Lisa Skroder - Trinity Air Ambulance International'
Cc: Maria@trinityairambulance.com
Subject: RE: Rosa: Re: Cleveland Clinic's new venture

Good Afternoon,

No, it will be held in the main hospital WW126A Conference Room.

Respectfully,

Jeanine Legón, BA
Executive Assistant to
Rosa M. Costanzo, CMRP, CPPB, CPSM
Vice President, Strategic Sourcing & Supply Chain Management/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096
Telephone: (305) 585-7333
Facsimile: (305) 585-1412
Jeanine.Legon@jhsiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

From: Inger Lisa Skroder - Trinity Air Ambulance International [<mailto:IngerLisa@TrinityAirAmbulance.com>]
Sent: Friday, January 08, 2016 12:40 PM
To: Legon, Jeanine

Cc: Maria@trinityairambulance.com

Subject: RE: Rosa: Re: Cleveland Clinic's new venture

Is this the address and room number ?

Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882



Email: IngerLisa@TrinityAirAmbulance.com

Website: www.TrinityAirAmbulance.com



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From: Legon, Jeanine [<mailto:Jeanine.Legon@jhsiami.org>]

Sent: Friday, January 08, 2016 11:37 AM

To: 'Inger Lisa Skroder - Trinity Air Ambulance'

Cc: Maria@trinityairambulance.com

Subject: RE: Rosa: Re: Cleveland Clinic's new venture

Perfect. Thank you.

Respectfully,

Jeanine Legón, BA
Executive Assistant to
Rosa M. Costanzo, CMRP, CPPB, CPSM

Vice President, Strategic Sourcing & Supply Chain Management/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096
Telephone: (305) 585-7333
Facsimile: (305) 585-1412
Jeanine.Legon@jhsmiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

From: Inger Lisa Skroder - Trinity Air Ambulance [<mailto:IngerLisa@TrinityAirAmbulance.com>]
Sent: Friday, January 08, 2016 11:36 AM
To: Legon, Jeanine
Cc: Maria@trinityairambulance.com
Subject: Re: Rosa: Re: Cleveland Clinic's new venture

Hi Jeanne
Jan 21st at 2:30 pm will be good

Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

On Jan 8, 2016, at 11:30, Legon, Jeanine <Jeanine.Legon@jhsmiami.org> wrote:

Good Morning Ms. Skroder,

Would you be available to meet on January 21st at 2:30pm?

Respectfully,

Jeanine Legón, BA
Executive Assistant to
Rosa M. Costanzo, CMRP, CPPB, CPSM
Vice President, Strategic Sourcing & Supply Chain Management/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
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Telephone: (305) 585-7333
Facsimile: (305) 585-1412
Jeanine.Legon@jhsmiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International
[IngerLisa@TrinityAirAmbulance.com]
Sent: Thursday, January 07, 2016 07:37 PM Eastern Standard Time
To: Costanzo, Rosa M
Cc: 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance'
Subject: RE: Rosa: Re: Cleveland Clinic's new venture

Hi Rosa

Great, I am available up until next Thursday, Jan 14 when I leave for a few days. I will be returning on the am of Monday Jan 18th.

Let me know what dates and times are good for you & Alex.

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882

<image001.jpg>

Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

<image002.png> <image003.png> <image004.png> <image005.png> <image006.png>

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From: Costanzo, Rosa M [<mailto:RCostanz@jhsmiami.org>]
Sent: Thursday, January 07, 2016 7:31 PM
To: 'Inger Lisa Skroder - Trinity Air Ambulance International'
Subject: RE: Rosa: Re: Cleveland Clinic's new venture

I shared this communication with Alex Contreras, SVP. He would like to have a meeting to discuss opportunity. Jeanine will schedule.

Thank you
Rosa

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International
[IngerLisa@TrinityAirAmbulance.com]
Sent: Thursday, January 07, 2016 05:41 PM Eastern Standard Time
To: Costanzo, Rosa M
Cc: 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance'
Subject: Rosa: Re: Cleveland Clinic's new venture

Hi Rosa

Further to our call, here is the link to the information on the Cleveland Clinic in Weston.

They just recently got "licensed" as an air ambulance provider with the state on December 15, 2015.
Their provider number is AIR7020.

<https://apps.mqa.doh.state.fl.us/MQASearchServices/HealthCareProviders/LicenseVerification?LicId=110&ProCde=2603&org=Cleveland%20Clinic%20Florida%20Health%20System%20Nonprofit%20Corporation%20>

The Cleveland Clinic is contracted with an air carrier for their planes- just like how we are contracted with Jackson.

I believe that with our current contract and an amendment, we could offer the same "deal" that Cleveland Clinic is planning to offer to potential clients – in order to increase their transfers to themselves. The CC has also partnered with Miami Children's to try and cover neonates & peds.

I know that we (JHS & Trinity) would be able bring more clients directly to the Jackson Health System. JHS has FULL capabilities to manage any patient, unlike the CC.

Let me know if you would like to discuss further the possibilities.

Best regards,
Inger Lisa

License Verification

Printer Friendly Version

Cleveland Clinic Florida Health System Nonprofit Corporation

License Number: AIR7020

Data As Of 1/6/2016

- License Information
- Secondary Locations
- Discipline/Admin Action
- Supervising Practitioners
- Subordinate Practitioners

Profession

EMS Service Provider Air

License

AIR7020

License Status

Clear/

Qualifications

Interfacility

License Expiration Date

12/15/2017

License Original Issue Date

12/16/2015

Address of Record

3100 Weston Road
WESTON, FL 33331
UNITED STATES

Discipline on File

No

×

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Address

5280 NW 20th Terrace hanger #58 Ft. Lauderdale Executive Airport
FT LAUDERDALE, FL 33309

<image007.gif>

Name	Profession	License	Effective Date
ROUHANI, MAZYAR	Medical Doctor	<u>83806</u>	12/16/2015

Click on the License Number to view License Details for that Practitioner

Name	Profession	License	Effective Date
N691ES	Vehicle Permit (Aircraft)	<u>1819</u>	12/16/2015
N980AG	Vehicle Permit (Aircraft)	<u>1820</u>	12/16/2015

Click on the License Number to view License Details for that Practitioner

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<image007.gif>

Back

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Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882

<image001.jpg>

Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

<image002.png> <image003.png> <image004.png> <image005.png> <image006.png>

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From: Inger Lisa Skroder - Trinity Air Ambulance International
<IngerLisa@TrinityAirAmbulance.com>
Sent: Monday, February 1, 2016 1:47 PM
To: 'Costanzo, Rosa M'; 'Contreras, Alejandro E'
Cc: 'Trinity Air Ambulance - Maria'; 'Romano, Michelle A'
Subject: RE: JHS - transportation of patients // Broward General paying !

Alejandro

We have potential patients for Jackson. For example, we have been contacted for an American Citizen who was on vacation, slipped and fx femur. He has Medicare and supplemental United Health Care. He wants to be transported tomorrow, Feb 2nd.

If we can use our contracted JHS rate and bill the patient the remainder, we would be able to bring him to Jackson tomorrow.

Firstly, we would send over his Medical Coverage information to Jackson for "Financial Clearance".

What are your thoughts ?

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882



Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com



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to the intended recipient, you are advised that any use, dissemination, forwarding, printing, or copying of this information is strictly prohibited.

From: Costanzo, Rosa M [mailto:RCostanz@jhsmiami.org]
Sent: Monday, February 01, 2016 1:39 PM
To: Contreras, Alejandro E
Cc: 'Inger Lisa Skroder - Trinity Air Ambulance International'; 'Trinity Air Ambulance - Maria'; Romano, Michelle A
Subject: FW: JHS - transportation of patients // Broward General paying !
Importance: High

Alex-

See below and attachment. This is a quick follow up/example to the discussion we had with Trinity and the opportunity they have brought to our attention.

Let me know how I can help.

Thank you
Rosa

Rosa M. Costanzo, CMRP, CPPB, CPSM
VP/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096
Telephone: (305) 585-7333
Facsimile: (305) 585-1412
RCostanz@jhsmiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

From: Inger Lisa Skroder - Trinity Air Ambulance International [mailto:IngerLisa@TrinityAirAmbulance.com]
Sent: Monday, February 01, 2016 12:57 PM
To: Costanzo, Rosa M
Cc: 'Trinity Air Ambulance - Maria'
Subject: JHS - transportation of patients // Broward General paying !
Importance: High

Hi Rosa

We had done a request for documents from Broward Health. Today we received documents. Please see attached, whereby Broward paid for \$ 11,900 and the patient paid the air ambulance \$ 1,500.

This is what we are proposing to Jackson. Trinity will receive calls for transport. We work up our contractual rate with Jackson and the balance the patient , family and/or client pays.

Do you have time to speak today ?

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882



Email: IngerLisa@TrinityAirAmbulance.com
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<IngerLisa@TrinityAirAmbulance.com>
Sent: Monday, February 1, 2016 1:47 PM
To: 'Costanzo, Rosa M'; 'Contreras, Alejandro E'
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Alejandro

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Thank you,

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3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
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Email: IngerLisa@TrinityAirAmbulance.com
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Importance: High

Alex-

See below and attachment. This is a quick follow up/example to the discussion we had with Trinity and the opportunity they have brought to our attention.

Let me know how I can help.

Thank you
Rosa

Rosa M. Costanzo, CMRP, CPPB, CPSM
VP/ Chief Procurement Officer

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Sent: Monday, February 01, 2016 12:57 PM
To: Costanzo, Rosa M
Cc: 'Trinity Air Ambulance - Maria'
Subject: JHS - transportation of patients // Broward General paying !
Importance: High

Hi Rosa

We had done a request for documents from Broward Health. Today we received documents. Please see attached, whereby Broward paid for \$ 11,900 and the patient paid the air ambulance \$ 1,500.

This is what we are proposing to Jackson. Trinity will receive calls for transport. We work up our contractual rate with Jackson and the balance the patient , family and/or client pays.

Do you have time to speak today ?

Thank you,

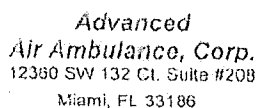
Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882



Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com



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Invoice Number:

Date of Service:

Payer:

Broward General Medical Center
Attn: [REDACTED] C.F.O.
1600 S. Andrews Ave.
Ft. Lauderdale, FL 33316

Customer ID: B.G.M.C

Auth or Claim #	Payment Terms	Flight Coord. ID	Due Date
	Net 3 Days	AM	
Description	Amount		
Air Ambulance Transportation Including Certified Medical Staff and Medical Equipment on Board, and ground transport at one end			
From: Ft. [REDACTED]			
COMMENTS: Payment received from patient's family member for the amount of \$1,500.00. The remaining outstanding balance is \$11,900.00 dollars.			

Please remit all payments to:

Advanced Air Ambulance, Corp.
12360 SW 132 Court, Suite #208
Miami, FL 33186

Tel: 305-232-7700

Fax: 305-232-7734

Fed

NPI #:

Subtotal

Total Invoice Amount

Payment Received

TOTAL

Check No:

ALL OVERDUE INVOICES ARE SUBJECT TO 1.5% MONTHLY FINANCE CHARGES.

Thank you for choosing Advanced Air Ambulance, Corp.
You may visit us at: www.FlyAmbu.com

From: Inger Lisa Skroder - Trinity Air Ambulance International
<IngerLisa@TrinityAirAmbulance.com>
Sent: Monday, February 1, 2016 1:47 PM
To: 'Costanzo, Rosa M'; 'Contreras, Alejandro E'
Cc: 'Trinity Air Ambulance - Maria'; 'Romano, Michelle A'
Subject: RE: JHS - transportation of patients // Broward General paying !

Alejandro

We have potential patients for Jackson. For example, we have been contacted for an American Citizen who was on vacation, slipped and fx femur. He has Medicare and supplemental United Health Care. He wants to be transported tomorrow, Feb 2nd.

If we can use our contracted JHS rate and bill the patient the remainder, we would be able to bring him to Jackson tomorrow.

Firstly, we would send over his Medical Coverage information to Jackson for "Financial Clearance".

What are your thoughts ?

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882



Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com



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to the intended recipient, you are advised that any use, dissemination, forwarding, printing, or copying of this information is strictly prohibited.

From: Costanzo, Rosa M [mailto:RCostanz@jhsmiami.org]
Sent: Monday, February 01, 2016 1:39 PM
To: Contreras, Alejandro E
Cc: 'Inger Lisa Skroder - Trinity Air Ambulance International'; 'Trinity Air Ambulance - Maria'; Romano, Michelle A
Subject: FW: JHS - transportation of patients // Broward General paying !
Importance: High

Alex-

See below and attachment. This is a quick follow up/example to the discussion we had with Trinity and the opportunity they have brought to our attention.

Let me know how I can help.

Thank you
Rosa

Rosa M. Costanzo, CMRP, CPPB, CPSM
VP/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096
Telephone: (305) 585-7333
Facsimile: (305) 585-1412
RCostanz@jhsmiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

From: Inger Lisa Skroder - Trinity Air Ambulance International [mailto:IngerLisa@TrinityAirAmbulance.com]
Sent: Monday, February 01, 2016 12:57 PM
To: Costanzo, Rosa M
Cc: 'Trinity Air Ambulance - Maria'
Subject: JHS - transportation of patients // Broward General paying !
Importance: High

Hi Rosa

We had done a request for documents from Broward Health. Today we received documents. Please see attached, whereby Broward paid for \$ 11,900 and the patient paid the air ambulance \$ 1,500.

This is what we are proposing to Jackson. Trinity will receive calls for transport. We work up our contractual rate with Jackson and the balance the patient , family and/or client pays.

Do you have time to speak today ?

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
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Email: IngerLisa@TrinityAirAmbulance.com
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From: Costanzo, Rosa M <RCostanz@jhsmiami.org>
Sent: Wednesday, February 10, 2016 9:28 AM
To: Contreras, Alejandro E
Cc: Romano, Michelle A
Subject: FW: Rosa: Trinity Air Ambulance - 24/7/365 Air Ambulance Transportation Call Center

FYI-I don't think I had shared this communication.

Rosa M. Costanzo, CMRP, CPPB, CPSM
VP/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096
Telephone: (305) 585-7333
Facsimile: (305) 585-1412
RCostanz@jhsmiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

From: Inger Lisa Skroder - Trinity Air Ambulance International [mailto:IngerLisa@TrinityAirAmbulance.com]
Sent: Wednesday, January 27, 2016 1:17 PM
To: Costanzo, Rosa M
Cc: 'Trinity Air Ambulance - Maria'
Subject: RE: Rosa: Trinity Air Ambulance - 24/7/365 Air Ambulance Transportation Call Center

Hi Rosa

Thank you for setting up the meeting with your colleagues at JHS last week. Further to our meeting, I have put together the following list of how this venture would work. Take a look at it and we can discuss further. Let me know when you want to get together again.

Addendum to RFP No. RFP-13-11355-CS Air Ambulance Services

Jackson Health System 24/7/365 Air Ambulance Transportation Call Center

Partners: Jackson Health System (JHS) - Trinity Air Ambulance International (Trinity)

- Trinity will provide a dedicated "24/7/365 Transportation Call Center and dedicated line for all incoming flight & transfer calls.
- Trinity will offer bed to bed transfer to JHS
- If client is a direct client of Trinity's, Trinity will collect coordination fee and bill Jackson per contracted AA.
- If client is a Jackson negotiated partner, Jackson will bill directly to client and collect. Trinity will bill Jackson per contracted AA rate.
- JHS and Trinity to market services of air and hospitalization to Trinity's clients

Point of Call Procedure

1. Trinity will receive call from potential client, obtain Medical Information, Patient Demographics, Patient's Primary and Secondary Insurance.
2. Trinity will make contact with Jackson International or Jackson Transfer Center to provide Patient information, as above in # 1, for verifying health insurance coverage & acceptance to Jackson facilities.
3. Once patient is cleared for acceptance and financial clearance, Trinity will finalize transport and perform mission. Trinity will provide JHS with patient status and ETA to JHS facility.

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882



Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com



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From: Legon, Jeanine [<mailto:Jeanine.Legon@jhs-miami.org>]
Sent: Friday, January 08, 2016 2:00 PM
To: 'Trinity Air Ambulance - Maria'; 'Inger Lisa Skroder - Trinity Air Ambulance International'
Subject: RE: Rosa: Re: Cleveland Clinic's new venture

My pleasure ☺

Respectfully,

Jeanine Legón, BA
Executive Assistant to
Rosa M. Costanzo, CMRP, CPPB, CPSM
Vice President, Strategic Sourcing & Supply Chain Management/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096
Telephone: (305) 585-7333
Facsimile: (305) 585-1412
Jeanine.Legon@jhsmiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Friday, January 08, 2016 1:52 PM
To: Legon, Jeanine; 'Inger Lisa Skroder - Trinity Air Ambulance International'
Cc: maria@trinityairambulance.com
Subject: RE: Rosa: Re: Cleveland Clinic's new venture

Thank you very much Jeanine.

Kind Regards,

Maria Pejdanovska
Trinity Air Ambulance International, LLC
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308

Ph: 954-771-7911
Fax: 954-771-4882



Email: Maria@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com



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From: Legon, Jeanine [<mailto:Jeanine.Legon@jhsmiami.org>]
Sent: Friday, January 08, 2016 1:51 PM
To: 'Trinity Air Ambulance - Maria'; 'Inger Lisa Skroder - Trinity Air Ambulance International'
Subject: RE: Rosa: Re: Cleveland Clinic's new venture

1611 NW 12 Avenue, Miami, Florida 33136

1st Floor of the hospital, by the hospital gift shop.

Respectfully,

Jeanine Legón, BA
Executive Assistant to
Rosa M. Costanzo, CMRP, CPPB, CPSM
Vice President, Strategic Sourcing & Supply Chain Management/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096
Telephone: (305) 585-7333
Facsimile: (305) 585-1412
Jeanine.Legon@jhsmiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Friday, January 08, 2016 1:41 PM
To: Legon, Jeanine; 'Inger Lisa Skroder - Trinity Air Ambulance International'
Cc: maria@trinityairambulance.com
Subject: RE: Rosa: Re: Cleveland Clinic's new venture

Jeanine,

Can you please provide us the exact address and the floor number.

Kind Regards,

Maria Pejdanovska
Trinity Air Ambulance International, LLC
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308

Ph: 954-771-7911
Fax: 954-771-4882



Email: Maria@TrinityAirAmbulance.com

Website: www.TrinityAirAmbulance.com



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From: Legon, Jeanine [<mailto:Jeanine.Legon@jhsMiami.org>]

Sent: Friday, January 08, 2016 1:45 PM

To: 'Inger Lisa Skroder - Trinity Air Ambulance International'

Cc: Maria@trinityairambulance.com

Subject: RE: Rosa: Re: Cleveland Clinic's new venture

Good Afternoon,

No, it will be held in the main hospital WW126A Conference Room.

Respectfully,

Jeanine Legón, BA

Executive Assistant to

Rosa M. Costanzo, CMRP, CPPB, CPSM

Vice President, Strategic Sourcing & Supply Chain Management/ Chief Procurement Officer

Jackson Health System

Jackson Medical Towers

1500 NW 12 Avenue - Suite 820

Miami, Florida 33136-1096

Telephone: (305) 585-7333

Facsimile: (305) 585-1412

Jeanine.Legon@jhsMiami.org

Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

From: Inger Lisa Skroder - Trinity Air Ambulance International [<mailto:IngerLisa@TrinityAirAmbulance.com>]

Sent: Friday, January 08, 2016 12:40 PM

To: Legon, Jeanine

Cc: Maria@trinityairambulance.com

Subject: RE: Rosa: Re: Cleveland Clinic's new venture

Is this the address and room number ?

Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882



Email: IngerLisa@TrinityAirAmbulance.com

Website: www.TrinityAirAmbulance.com



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From: Legon, Jeanine [<mailto:Jeanine.Legon@jhsMiami.org>]

Sent: Friday, January 08, 2016 11:37 AM

To: 'Inger Lisa Skroder - Trinity Air Ambulance'

Cc: Maria@trinityairambulance.com

Subject: RE: Rosa: Re: Cleveland Clinic's new venture

Perfect. Thank you.

Respectfully,

Jeanine Legón, BA
Executive Assistant to
Rosa M. Costanzo, CMRP, CPPB, CPSM

Vice President, Strategic Sourcing & Supply Chain Management/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096
Telephone: (305) 585-7333
Facsimile: (305) 585-1412
Jeanine.Legon@jhsmiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

From: Inger Lisa Skroder - Trinity Air Ambulance [<mailto:IngerLisa@TrinityAirAmbulance.com>]
Sent: Friday, January 08, 2016 11:36 AM
To: Legon, Jeanine
Cc: Maria@trinityairambulance.com
Subject: Re: Rosa: Re: Cleveland Clinic's new venture

Hi Jeanne
Jan 21st at 2:30 pm will be good

Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

On Jan 8, 2016, at 11:30, Legon, Jeanine <Jeanine.Legon@jhsmiami.org> wrote:

Good Morning Ms. Skroder,

Would you be available to meet on January 21st at 2:30pm?

Respectfully,

Jeanine Legón, BA
Executive Assistant to
Rosa M. Costanzo, CMRP, CPPB, CPSM
Vice President, Strategic Sourcing & Supply Chain Management/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096
Telephone: (305) 585-7333
Facsimile: (305) 585-1412
Jeanine.Legon@jhsmiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International
[IngerLisa@TrinityAirAmbulance.com]
Sent: Thursday, January 07, 2016 07:37 PM Eastern Standard Time
To: Costanzo, Rosa M
Cc: 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance'
Subject: RE: Rosa: Re: Cleveland Clinic's new venture

Hi Rosa

Great, I am available up until next Thursday, Jan 14 when I leave for a few days. I will be returning on the am of Monday Jan 18th.

Let me know what dates and times are good for you & Alex.

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882

<image001.jpg>

Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

<image002.png> <image003.png> <image004.png> <image005.png> <image006.png>

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From: Costanzo, Rosa M [<mailto:RCostanz@jhsmiami.org>]
Sent: Thursday, January 07, 2016 7:31 PM
To: 'Inger Lisa Skroder - Trinity Air Ambulance International'
Subject: RE: Rosa: Re: Cleveland Clinic's new venture

I shared this communication with Alex Contreras, SVP. He would like to have a meeting to discuss opportunity. Jeanine will schedule.

Thank you
Rosa

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International
[IngerLisa@TrinityAirAmbulance.com]
Sent: Thursday, January 07, 2016 05:41 PM Eastern Standard Time
To: Costanzo, Rosa M
Cc: 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance'
Subject: Rosa: Re: Cleveland Clinic's new venture

Hi Rosa

Further to our call, here is the link to the information on the Cleveland Clinic in Weston.

They just recently got "licensed" as an air ambulance provider with the state on December 15, 2015.
Their provider number is AIR7020.

<https://apps.mga.doh.state.fl.us/MQASearchServices/HealthCareProviders/LicenseVerification?LicInd=110&ProCde=2603&org=Cleveland%20Clinic%20Florida%20Health%20System%20Nonprofit%20Corporation%20>

The Cleveland Clinic is contracted with an air carrier for their planes- just like how we are contracted with Jackson.

I believe that with our current contract and an amendment, we could offer the same "deal" that Cleveland Clinic is planning to offer to potential clients – in order to increase their transfers to themselves. The CC has also partnered with Miami Children's to try and cover neonates & peds.

I know that we (JHS & Trinity) would be able bring more clients directly to the Jackson Health System. JHS has FULL capabilities to manage any patient, unlike the CC.

Let me know if you would like to discuss further the possibilities.

Best regards,
Inger Lisa

License Verification

Printer Friendly Version

Cleveland Clinic Florida Health System Nonprofit Corporation

License Number: AIR7020

Data As Of 1/6/2016

- [License Information](#)
- [Secondary Locations](#)
- [Discipline/Admin Action](#)
- [Supervising Practitioners](#)
- [Subordinate Practitioners](#)

Profession

EMS Service Provider Air

License

AIR7020

License Status

Clear/

Qualifications

Interfacility

License Expiration Date

12/15/2017

License Original Issue Date

12/16/2015

Address of Record

3100 Weston Road
WESTON, FL 33331
UNITED STATES

Discipline on File

No

×

Public Complaint Definition

Public Complaint - A public complaint (administrative complaint) is not disciplinary action. It is a charging document that has not been proven. A public administrative complaint is the result of a complaint and the investigation of the allegation of a violation of the practice act that governs a health care profession. The administrative complaint lists the violations of law that were alleged after the investigation and review that resulted in a finding of probable cause.

By law, the administrative complaint becomes public 10 days after a finding of probable cause or when the licensee waives the privilege of confidentiality. Every administrative complaint is reviewed by the appropriate licensing board, or the department if there is no board, as one step in the hearing process that provides the subject of the complaint with due process of law. Some public administrative complaints are dismissed at the hearing stage. Other administrative complaints result in disciplinary action imposed by a final order, which is reflected as a "YES" in the "Discipline on File" entry on the licensee verification screen.

YES = A public administrative complaint in which discipline has been taken, or a public administrative complaint pending action by the board or department.

NO = No public administrative complaint has been filed, or an administrative complaint was filed and later dismissed.

The License Verification site will display a YES indicator for administrative complaints filed on or after November 1999. Public complaints filed prior to November 1999 are available by request from the Department.

×

License Status Definitions

×

Controlled Substance Prescriber Definition

Controlled Substance Prescriber - In accordance with s. 456.44, Florida Statutes, a physician licensed under chapter 458, chapter 459, chapter 461, or chapter 466 who prescribes any controlled substance, listed in Schedule II, Schedule III, or Schedule IV as defined in s. 893.03, for the treatment of chronic nonmalignant pain, must designate himself or herself as a controlled substance prescribing practitioner on the physician's practitioner profile.

"Chronic nonmalignant pain" means pain unrelated to cancer which persists beyond the usual course of disease or the injury that is the cause of the pain or more than 90 days after surgery.

Address

5280 NW 20th Terrace hanger #58 Ft. Lauderdale Executive Airport
FT LAUDERDALE, FL 33309

<image007.gif>

Name	Profession	License	Effective Date
ROUHANI, MAZYAR	Medical Doctor	<u>83806</u>	12/16/2015

Click on the License Number to view License Details for that Practitioner

Name	Profession	License	Effective Date
N691ES	Vehicle Permit (Aircraft)	<u>1819</u>	12/16/2015
N980AG	Vehicle Permit (Aircraft)	<u>1820</u>	12/16/2015

Click on the License Number to view License Details for that Practitioner

No Continuing Education Hours Received from Approved Providers As Of 1/7/2016

* To find out more about Approved Providers, or ask a provider why the course you took is not yet listed, please visit our [Continuing Education Providers](#) page.

** Personal Development is limited to no more than 3 hours per renewal cycle. Any personal development hours in excess of this 3 hour maximum cannot be used for renewal and have been subtracted from the total available for renewal.

Please do not fax proof of Continuing Education hours to the Board Office until you have received your renewal notice in the mail.

<image007.gif>

Back

For instructions on how to request a license certification of your Florida license to be sent to another state from the Florida Department of Health, [please visit the License Certifications web page.](#)

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882

<image001.jpg>

Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

<image002.png> <image003.png> <image004.png> <image005.png> <image006.png>

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From: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Sent: Friday, February 12, 2016 7:14 AM
To: Costanzo, Rosa M; Romano, Michelle A
Subject: RE: Trinity Air // Jackson Meeting Friday, Feb 12, 2016 at 09:30 AM

My office if possible

From: Costanzo, Rosa M
Sent: Friday, February 12, 2016 7:13 AM
To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>; Romano, Michelle A <Michelle.Romano@jhsmiami.org>
Subject: RE: Trinity Air // Jackson Meeting Friday, Feb 12, 2016 at 09:30 AM

Thank you Alex. Where should they meet you?

From: Contreras, Alejandro E
Sent: Thursday, February 11, 2016 10:04 PM
To: Costanzo, Rosa M
Subject: Re: Trinity Air // Jackson Meeting Friday, Feb 12, 2016 at 09:30 AM

I am available from 10-11 if they have 5 minutes I will like to go into detail as to what we implemented today

Sent from my iPhone

On Feb 11, 2016, at 9:34 PM, Costanzo, Rosa M <RCostanz@jhsmiami.org> wrote:

Ok, Trinity is coming in for a mtg in purchasing at 9:30am if you'd like to join.

-----Original Message-----

From: Contreras, Alejandro E
Sent: Thursday, February 11, 2016 09:32 PM Eastern Standard Time
To: Costanzo, Rosa M
Cc: Inger Lisa Skroder - Trinity Air Ambulance International; Romano, Michelle A; Maria@trinityairambulance.com; Figueroa, Andrew J; Bennett, Meghan C.; DeJesus, Yahaira; Tor Leif Erik Skroder; Battle-Triana, Indra S; Alfaro, Pedro A
Subject: Re: Trinity Air // Jackson Meeting Friday, Feb 12, 2016 at 09:30 AM

We investigated today and can provide details on actions taken tomorrow. I am confident that this will never happen again. Staff has been reeducate dandy expectations are very clear

Sent from my iPhone

On Feb 11, 2016, at 9:29 PM, Costanzo, Rosa M <RCostanz@jhsmiami.org> wrote:

Inger Lisa-

Sorry for this late email. Tomorrow's meeting should be focused on getting resolution to the organ air contract. I need to include other people when it comes to the air ambulance (i.e. Alex Contreras, Indra Battle and Pedro Alfaro).

Thank you
Rosa

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International
[IngerLisa@TrinityAirAmbulance.com]

Sent: Thursday, February 11, 2016 02:33 PM Eastern Standard Time

To: Romano, Michelle A; Maria@trinityairambulance.com

Cc: Figueroa, Andrew J; Bennett, Meghan C.; Costanzo, Rosa M; DeJesus, Yahaira; 'Tor Leif Erik Skroder'

Subject: RE: Trinity Air // Jackson Meeting Friday, Feb 12, 2016 at 09:30 AM

Rosa

Can we discuss the following tomorrow

1. Modifications to the Organ Contract – to include Cancellation
2. Modification of the Air Ambulance – to include Cancellation
3. Additional Funding for Air Ambulance Contract to cover remainder of contract
4. December 30th, 2015 – Jackson flight that was given to REVA
5. February 10th, 2016 – Jackson personnel advising Trinity's Client (QHM) that Jackson doesn't work with Trinity – works with REVA.

Please advise of the meeting location, room and address

Thank you,

Inger Lisa Skroder, MN, ARNP

Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308

Ph: 954-771-7911

Cell: 305-205-0570

Fax: 954-771-4882

<image001.jpg>

Email: IngerLisa@TrinityAirAmbulance.com

Website: www.TrinityAirAmbulance.com

<image002.png> <image003.png> <image004.png> <image005.png> <image006.png>

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From: Inger Lisa Skroder - Trinity Air Ambulance International

[<mailto:IngerLisa@TrinityAirAmbulance.com>]

Sent: Thursday, February 11, 2016 2:10 PM

To: 'Romano, Michelle A'; Maria@trinityairambulance.com

Cc: 'Figueroa, Andrew J'; 'Bennett, Meghan C.'; 'Costanzo, Rosa M'; 'DeJesus, Yahaira'; 'Tor Leif Erik Skroder'

Subject: RE: Trinity Air Modifications to Organ Air Contract

Michelle

We can be there tomorrow, Friday, Feb 12 at 09:30 AM. Please advise what building, room & address ?

Thank you,

Inger Lisa Skroder, MN, ARNP

Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308

Ph: 954-771-7911

Cell: 305-205-0570

Fax: 954-771-4882

<image001.jpg>

Email: IngerLisa@TrinityAirAmbulance.com

Website: www.TrinityAirAmbulance.com

<image002.png> <image003.png> <image004.png> <image005.png> <image006.png>

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From: Inger Lisa Skroder - Trinity Air Ambulance International
[mailto:IngerLisa@TrinityAirAmbulance.com]

Sent: Thursday, February 11, 2016 12:31 PM

To: 'Romano, Michelle A'; Maria@trinityairambulance.com; tor@trinityairambulance.com

Cc: 'Figueroa, Andrew J'; 'Bennett, Meghan C.'; 'Costanzo, Rosa M'; 'DeJesus, Yahaira'
Subject: RE: Trinity Air Modifications to Organ Air Contract

Michelle

Thank you for your follow up. Tomorrow, Friday Feb 12 will be fine.

I am just waiting for Tor to land to confirm if he will be coming and what time works best.

** We will also need to do a Modification to the Air Ambulance Contract for the same. Can you have that ready as well ?

I will revert back to you after 2:30 PM

Thank you,

Inger Lisa Skroder, MN, ARNP

Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308

Ph: 954-771-7911

Cell: 305-205-0570

Fax: 954-771-4882

<image001.jpg>

Email: IngerLisa@TrinityAirAmbulance.com

Website: www.TrinityAirAmbulance.com

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From: Romano, Michelle A [<mailto:Michelle.Romano@jhsMiami.org>]
Sent: Thursday, February 11, 2016 12:32 PM
To: 'IngerLisa@trinityairambulance.com'; 'Maria@trinityairambulance.com'; 'tor@trinityairambulance.com'
Cc: Figueroa, Andrew J; Bennett, Meghan C.; Costanzo, Rosa M; DeJesus, Yahaira
Subject: Trinity Air Modifications to Organ Air Contract

Hi Inger: I hope you are doing well. We received your email regarding wanting a call to further discuss finalization of the Contract Modifications previously sent to you.

Please let us know your availability for tomorrow morning or afternoon so that we can speak and get this resolved as we want to finalize as soon as possible.

We are available during the following times:

Friday Morning from 9:30 to 11:00

Friday Afternoon any time after 3:00

Thank you!

Michelle Romano, MPA

Director

Procurement Management Department

Jackson Health System

Jackson Medical Towers

1500 NW 12th Avenue, Suite No. 814

Miami, Florida 33136

305.585.7957

305.355.2303 (Fax)

Michelle.Romano@jhsmiami.org

<image007.jpg>



Think Green! Please do not print this e-mail unless necessary

Supplier Portal

Jackson Health System is now using an electronic procurement solicitation system. Please access our Supplier Portal using the following link to review and respond to solicitations.

Please note that you will be able to view open solicitations by clicking on the BROWSE OPEN EVENTS link. In order to respond electronically to a solicitation, you will need to create a no fee account. You can create an account by clicking the following link: <http://www.jacksonhealth.org/vendors-supplier-portal.asp>

Please know that this does not take the place of the Public Health Trust's Vendor Registration which is required for the award of all contracts. The vendor registration application can be found on the JHS website via the following link:

[Vendor Registration](#)

Jackson Health System is part of the Reptrax vendor credentialing community. All vendors who wish to gain access to our facilities are required to register by visiting www.Reptrax.com.

From: Inger Lisa Skroder - Trinity Air Ambulance International
<IngerLisa@TrinityAirAmbulance.com>
Sent: Thursday, February 18, 2016 11:03 AM
To: 'Contreras, Alejandro E'
Cc: 'Maria P'
Subject: JHS - Transport Procedure for Incoming & Outgoing Patients for Jackson

Alex

Sorry to have interrupted your meeting. I am including Maria from my office in this email so she understands what we spoke about: the procedure for Incoming & Outgoing patients.

RE: JACKSON & TRINITY AIR AMBULANCE PROCEDURES

1. Incoming patients, Trinity will obtain "Financial Clearance" & Acceptance from the Jackson International or Jackson Domestic Department, and then Trinity will transport and then bill Jackson
2. Outgoing patients, Trinity will confirm health insurance coverage (for Subrogation purposes) and then Trinity will transport and then bill Jackson

JHS has a patient Mrs. RW who is in the MICU. She is ready for transfer to Virginia to the US Naval Hospital. Our aircraft and team have been on standby since last evening. The patient has Tricare coverage. It is taking a while to get authorization/approval in place from Tricare. Trinity will arrange and perform the transport from Jackson to the US Naval Hospital in Virginia – and then Trinity will bill and seek payment from Jackson. Trinity will subrogate the claim to the patient's primary coverage of Tricare.

So Maria, go ahead and activate our crew for the air ambulance.

***Alex- moving forward we will follow # 1 and # 2 procedures and just perform the missions – without having to bother you on each mission.

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882



Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com



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From: Trinity Air Ambulance - Maria <maria@trinityairambulance.com>
Sent: Tuesday, February 23, 2016 1:03 PM
To: 'Verdecia, Ernest'
Cc: 'Contreras, Alejandro E'; maria@trinityairambulance.com
Subject: RE: W [REDACTED] M [REDACTED] Invoice 16JHS0122WM from Trinity Air Ambulance International, LLC

Good Morning Ernie,

This is another case that we arranged thru Jackson International. Patient was financially cleared by Miguel Del Toro, International Coordinator, International Department, Jackson Memorial Hospital.

Further to Inger Lisa's meeting with Mr. Contreras, we are following the directive of potential patients needing admission are to be "Financially Cleared" by Jackson International. Once the patient is "financially cleared" we transport to Jackson Memorial in Miami or Jackson North in North Miami depending on the patient's medical needs and bed space.

Maria

-----Original Message-----

From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhsMiami.org]
Sent: Tuesday, February 23, 2016 1:00 PM
To: Trinity Air Ambulance - Maria
Cc: Contreras, Alejandro E
Subject: RE: W [REDACTED] M [REDACTED] - Invoice 16JHS0122WM from Trinity Air Ambulance International, LLC

Hi Maria

I need a little more info on this one who arranged this call?

Ernie

-----Original Message-----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Tuesday, February 23, 2016 12:06 PM
To: ghxdap.jacksonhealthsystems@na.firstsource.com
Cc: Verdecia, Ernest; Contreras, Alejandro E; maria@trinityairambulance.com
Subject: JHS: W [REDACTED] M [REDACTED] - Invoice 16JHS0122WM from Trinity Air Ambulance International, LLC

Good Afternoon,

Please find attached our invoice for patient W [REDACTED] M [REDACTED] that we brought to Jackson yesterday February 22nd, 2016.

Please confirm receipt.

Kind Regards,

Maria Pejdanovska
Trinity Air Ambulance International, LLC
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308

Ph: 954-771-7911
Fax: 954-771-4882

Email: Maria@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

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From: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Sent: Tuesday, March 8, 2016 3:15 PM
To: Trinity Air Ambulance - Maria
Cc: ghxodap.jacksonhealthsystems@na.firstsource.com; Verdecia, Ernest
Subject: Re: JHS: G [REDACTED] D [REDACTED] - Invoice 16JHS0307GD from Trinity Air Ambulance International, LLC

I do not process invoices

Sent from my iPhone

> On Mar 8, 2016, at 3:12 PM, Trinity Air Ambulance - Maria <maria@trinityairambulance.com> wrote:

>

> Good Afternoon,

>

> Please find attached our invoice for transport of patient that we
> brought to Jackson - Ryder Trauma Center yesterday March 7th, 2016.

>

> Please confirm receipt.

>

>

> Kind Regards,

>

> Maria Pejdanovska

> Trinity Air Ambulance International, LLC

> 3535 Galt Ocean Drive

> Fort Lauderdale, Florida 33308

>

> Ph: 954-771-7911

> Fax: 954-771-4882

>

>

>

> Email: Maria@TrinityAirAmbulance.com

> Website: www.TrinityAirAmbulance.com

>

>

>

> *****

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> *****

> *****

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>
>
>
> <Inv_16JHS0307GD_from_Trinity_Air_Ambulance_International_LLC_6284.pdf
> >

From: Ernest.Verdecia@jhsmiami.org
Sent: Tuesday, April 5, 2016 2:16 PM
To: IngerLisa@TrinityAirAmbulance.com
Cc: Maria@trinityairambulance.com
Subject: RE: JHS invoices

Hi Maria and Lisa,

Please send me all invoices you have pending of patients you have brought into any Jackson facility in the past 60 days

Thanks

Ernie

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance [mailto:IngerLisa@TrinityAirAmbulance.com]
Sent: Saturday, April 02, 2016 11:43 AM
To: Verdecia, Ernest
Cc: Maria P
Subject: JHS invoices

Hi Ernie

Nice speaking with you today.

On another note, can you find out what the status is of our invoices as we have not received payment for some time.

Can we have a conference call on Thursday, April 7th to discuss the status or if you could email Maria the list - thanks !

Have a nice weekend

Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

From: Ernest.Verdecia@jhsmiami.org
Sent: Tuesday, April 5, 2016 1:35 PM
To: Elvia.Armengol1@jhsmiami.org
Subject: Patients coming into Jackson from Trinity Air

Hi Elvia,
I'm receiving invoices from Trinity on patients they are bring into our facilities, but there is no way for me to verify, Can you help?

Ernie

Ernest Verdecia
Medical Transportation and Emergency Management
Transportation Officer for Jackson Health Systems

Quality & Patient Safety
Jackson Health System
1611 NW 12th Ave
Institute Building 119, Suite 334
Miami, FL 33136
Office: 305-585-8403
in-House: 362284
E-mail: ernest.verdecia@jhsmiami.org



Think Green

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From: Ernest.Verdecia@jhsmiami.org
Sent: Tuesday, April 5, 2016 2:16 PM
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Cc: Maria@trinityairambulance.com
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Hi Maria and Lisa,

Please send me all invoices you have pending of patients you have brought into any Jackson facility in the past 60 days

Thanks

Ernie

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Have a nice weekend

Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

From: Ernest.Verdecia@jhsmiami.org
Sent: Thursday, April 7, 2016 10:32 AM
To: luis.fernandez@jhsmiami.org
Cc: Alejandro.Contreras@jhsmiami.org
Subject: FW: Trinity Invoices for patients coming in

Hi Louie ,

Trinity is billing us for calls they are bringing in to North and main, but the international dept. says they should bill insurance, they are not authorizing payment. Can you check with Alex Contreras maybe there is an arrangement I don't know about?

Thanks

Ernie

From: Armengol, Elvia M
Sent: Wednesday, April 06, 2016 12:35 PM
To: Verdecia, Ernest
Cc: Corrales, Diamela
Subject: Trinity Invoices

Hi,

As per our phone conversation, we have review invoices from Trinity for incoming international transfer and we are unaware of the reasons why Trinity would be billing JMH. Therefore, as per Diamela please reach out to Mr. Contreras for further insight.

We appreciated your confidence.

 **Elvia Armengol**
Supervisor of International Operations



Jackson Memorial Hospital
Hospitality Center
DTC Building, Ground Floor
1080 NW 19 Street
Miami, FL 33136
Main#: (305) 355-1212 - 24/7
Fax: (305) 585-6833
Mobile: (786) 393-3783
elvia.armengol1@jhsmiami.org
internationaltransfer@jhsmiami.org

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24/7 JHS International Transfer Center:

+1.305-355-1212 / internationaltransfer@jhs-miami.org

International Out Patient Appointment Line:

+1.305.355.1342 / InternationalAppointment@jhs-miami.org

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From: Verdecia, Ernest
Sent: Wednesday, April 06, 2016 11:27 AM
To: Armengol, Elvia M
Subject: RE: Quick meeting

Thanks

From: Armengol, Elvia M
Sent: Wednesday, April 06, 2016 11:26 AM
To: Verdecia, Ernest
Subject: RE: Quick meeting

Sure, I'm looking up these encounters now. I'll let you know once I've located them and we can meet.

Elvy

From: Verdecia, Ernest
Sent: Wednesday, April 06, 2016 11:15 AM
To: Armengol, Elvia M
Subject: Quick meeting

Hi Elvia

Can we have a quick meeting to discuss this invoice process?

Let me know what works for you shouldn't take more than 30 mins

Thanks

Ernie

Ernest Verdecia
Medical Transportation and Emergency Management
Transportation Officer for Jackson Health Systems

Quality & Patient Safety
Jackson Health System
1611 NW 12th Ave
Institute Building 119, Suite 334
Miami, FL 33136
Office: 305-585-8403
in-House: 362284
E-mail: ernest.verdecia@jhsmiami.org



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From: Alejandro.Contreras@jhsmiami.org
Sent: Thursday, April 7, 2016 1:12 PM
To: Ernest.Verdecia@jhsmiami.org
Cc: luis.fernandez@jhsmiami.org
Subject: Re: Trinity Invoices for patients coming in
Attachments: image004.jpg; image005.jpg; image001.jpg

If patient had insurance the insurance company should be billed

Sent from my iPhone

On Apr 7, 2016, at 10:32 AM, Verdecia, Ernest <Ernest.Verdecia@jhsmiami.org> wrote:

Hi Louie ,

Trinity is billing us for calls they are bringing in to North and main, but the international dept. says they should bill insurance, they are not authorizing payment. Can you check with Alex Contreras maybe there is an arrangement I don't know about?

Thanks

Ernie

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We appreciated your confidence.

<image001.jpg>Elvia Armengol
Supervisor of International Operations
<image004.jpg>
Jackson Memorial Hospital
Hospitality Center
DTC Building, Ground Floor
1080 NW 19 Street
Miami, FL 33136
Main#: (305) 355-1212 - 24/7
Fax: (305) 585-6833
Mobile: (786) 393-3783

elvia.armengol1@jhsmiami.org
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Ernie

Ernest Verdecia

**Medical Transportation and Emergency Management
Transportation Officer for Jackson Health Systems**

Quality & Patient Safety
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1611 NW 12th Ave
Institute Building 119, Suite 334
Miami, FL 33136
Office: 305-585-8403
in-House: 362284
E-mail: ernest.verdecia@jhsmiami.org

<image005.jpg>

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From: Alejandro.Contreras@jhsmiami.org
Sent: Thursday, April 7, 2016 1:15 PM
To: Ernest.Verdecia@jhsmiami.org
Cc: luis.fernandez@jhsmiami.org
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Follow up standard procedure for processing patients

Sent from my iPhone

> On Apr 7, 2016, at 12:10 PM, Verdecia, Ernest <Ernest.Verdecia@jhsmiami.org> wrote:

>

> Fyi please advise

>

> Thanks

>

> Ernie

>

> ----- Original Message -----

> From: Trinity Air Ambulance - Maria

> [mailto:maria@trinityairambulance.com]

> Sent: Thursday, April 07, 2016 11:59 AM

> To: Verdecia, Ernest

> Cc: Costanzo, Rosa M; maria@trinityairambulance.com

> <maria@trinityairambulance.com>

> Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air

> Ambulance

>

> Hi Ernie

>

> Thank you for your email. As requested please find the list of twenty

> two

> (22) invoices. I have included the following: date of service, patient

> name, invoice number and amount due.

>

> Please advise payment status for each.

>

> 1. October 17, 2015 [REDACTED] 15JHS1017YB \$19,920.00

> 2. January 28, 2016 [REDACTED] S [REDACTED] 16JHS0128KS \$10,000.00

> 3. February 19, 2016 [REDACTED] 16JHS0219BH \$17,254.88

> 4. February 22, 2016 [REDACTED] M [REDACTED] 16JHS0222WM \$15,134.40

> 5. February 23, 2016 [REDACTED] Z [REDACTED] h 16JHS0223MZ \$15,134.40

> 6. February 27, 2016 [REDACTED] 16JHS0226GB \$10,089.00

> 7. February 28, 2016 [REDACTED] 16JHS0228LS \$7,185.20

> 8. March 4, 2016 [REDACTED] 16JHS0303AR \$25,055.00

> 9. March 7, 2016 [REDACTED] 16JHS0307GD \$17,272.50

> 10. March 8, 2018 [REDACTED] 16JHS0308DG \$16,922.50

> 11. March 8, 2016 [REDACTED] 16JHS0308SS \$16,922.50

> 12. March 10, 2016	[REDACTED]	16JHS0310CK	\$16,772.60
> 13. March 11, 2016	[REDACTED]	16JHS0311KC	\$8,740.50
> 14. March 11, 2016	[REDACTED]	16JHS0311DB	\$15,682.10
> 15. March 11, 2016	[REDACTED]	16JHS0311JB	\$8,673.38
> 16. March 14, 2016	[REDACTED]	16JHS0314VP	\$17,159.10
> 17. March 17, 2016	[REDACTED]	16JHS0317PA	\$10,675.00
> 18. March 17, 2016	[REDACTED]	ourg 16JHS0317AA	\$17,632.00
> 19. March 27, 2016	[REDACTED]	16JHS0327FV	\$6,742.80
> 20. March 27, 2016	[REDACTED]	16JHS0327SQ	\$30,904.50
> 21. March 28, 2016	[REDACTED]	16JHS0328NM	\$20,201.00
> 22. March 29, 2016	[REDACTED]	16JHS0329MS	\$15,999.00

>

> Maria

>

>

> -----Original Message-----

> From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhsmiami.org]

> Sent: Tuesday, April 05, 2016 2:16 PM

> To: Inger Lisa Skroder - Trinity Air Ambulance

> Cc: Maria P

> Subject: RE: JHS invoices

>

> Hi Maria and Lisa,

>

> Please send me all invoices you have pending of patients you have

> brought into any Jackson facility in the past 60 days

>

> Thanks

>

>

> Ernie

>

>

>

> -----Original Message-----

> From: Inger Lisa Skroder - Trinity Air Ambulance

> [mailto:IngerLisa@TrinityAirAmbulance.com]

> Sent: Saturday, April 02, 2016 11:43 AM

> To: Verdecia, Ernest

> Cc: Maria P

> Subject: JHS invoices

>

> Hi Ernie

>

> Nice speaking with you today.

>

> On another note, can you find out what the status is of our invoices

> as we have not received payment for some time.

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> Can we have a conference call on Thursday, April 7th to discuss the

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- > Have a nice weekend
- >
- > Inger-Lisa Skroder, MN, ARNP
- > Trinity Air Ambulance International
- > Office: 954-771-7911
- > Mobile: 305-205-0570
- >
- >

From: Ernest.Verdecia@jhsmiami.org
Sent: Thursday, April 7, 2016 10:32 AM
To: luis.fernandez@jhsmiami.org
Cc: Alejandro.Contreras@jhsmiami.org
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Thanks


Ernie

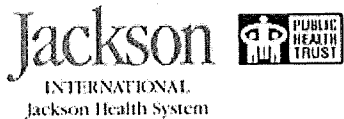
From: Armengol, Elvia M
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Cc: Corrales, Diamela
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 **Elvia Armengol**
Supervisor of International Operations



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elvia.armengol1@jhsmiami.org
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The Trauma and Critical Care Center of the Caribbean Basin - "3 Hours from Anywhere"

24/7 JHS International Transfer Center:

+1.305-355-1212 / internationaltransfer@jhs-miami.org

International Out Patient Appointment Line:

+1.305.355.1342 / InternationalAppointment@jhs-miami.org

The information contained in this transmission may contain privileged and confidential information, including patient information protected by federal and state privacy laws. It is intended only for the use of the person (s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

From: Verdecia, Ernest
Sent: Wednesday, April 06, 2016 11:27 AM
To: Armengol, Elvia M
Subject: RE: Quick meeting

Thanks

From: Armengol, Elvia M
Sent: Wednesday, April 06, 2016 11:26 AM
To: Verdecia, Ernest
Subject: RE: Quick meeting

Sure, I'm looking up these encounters now. I'll let you know once I've located them and we can meet.

Elvy

From: Verdecia, Ernest
Sent: Wednesday, April 06, 2016 11:15 AM
To: Armengol, Elvia M
Subject: Quick meeting

Hi Elvia

Can we have a quick meeting to discuss this invoice process?

Let me know what works for you shouldn't take more than 30 mins

Thanks

Ernie

Ernest Verdecia
Medical Transportation and Emergency Management
Transportation Officer for Jackson Health Systems

Quality & Patient Safety
Jackson Health System
1611 NW 12th Ave
Institute Building 119, Suite 334
Miami, FL 33136
Office: 305-585-8403
in-House: 362284
E-mail: ernest.verdecia@jhsmiami.org



Think Green

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From: Ernest.Verdecia@jhsmiami.org
Sent: Thursday, April 7, 2016 12:10 PM
To: luis.fernandez@jhsmiami.org; Alejandro.Contreras@jhsmiami.org
Subject: Fw: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Fyi please advise

Thanks

Ernie

----- Original Message -----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Thursday, April 07, 2016 11:59 AM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; maria@trinityairambulance.com <maria@trinityairambulance.com>
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

Thank you for your email. As requested please find the list of twenty two (22) invoices. I have included the following: date of service, patient name, invoice number and amount due.

Please advise payment status for each.

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21. March 28, 2016	16JHS0328NM	\$20,201.00	
22. March 29, 2016	16JHS0329MS	\$15,999.00	

Maria

-----Original Message-----

From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhsmiami.org]

Sent: Tuesday, April 05, 2016 2:16 PM

To: Inger Lisa Skroder - Trinity Air Ambulance

Cc: Maria P

Subject: RE: JHS invoices

Hi Maria and Lisa,

Please send me all invoices you have pending of patients you have brought into any Jackson facility in the past 60 days

Thanks

Ernie

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From: Inger Lisa Skroder - Trinity Air Ambulance [mailto:IngerLisa@TrinityAirAmbulance.com]

Sent: Saturday, April 02, 2016 11:43 AM

To: Verdecia, Ernest

Cc: Maria P

Subject: JHS invoices

Hi Ernie

Nice speaking with you today.

On another note, can you find out what the status is of our invoices as we have not received payment for some time.

Can we have a conference call on Thursday, April 7th to discuss the status or if you could email Maria the list - thanks !

Have a nice weekend

Inger-Lisa Skroder, MN, ARNP

Trinity Air Ambulance International

Office: 954-771-7911

Mobile: 305-205-0570

From: Alejandro.Contreras@jhsmiami.org
Sent: Tuesday, April 12, 2016 3:50 PM
To: Ernest.Verdecia@jhsmiami.org; Diamela.Corrales@jhsmiami.org;
luis.fernandez@jhsmiami.org
Subject: FW: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

-----Original Message-----

From: Contreras, Alejandro E
Sent: Tuesday, April 12, 2016 3:49 PM
To: 'Inger Lisa Skroder - Trinity Air Ambulance International' <IngerLisa@TrinityAirAmbulance.com>; Pacheco, Jannette <jannette.pacheco@jhsmiami.org>
Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'Maria P' <Maria@TrinityAirAmbulance.com>
Subject: RE: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

I want to make sure that we are on the same page. I expect that Trinity will bill insurance for patients. If insurance does not cover and we approved they can bill us. We are not a provider and we do not bill

Jannette- Please schedule urgent call for tomorrow

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International [mailto:IngerLisa@TrinityAirAmbulance.com]
Sent: Monday, April 11, 2016 7:49 PM
To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'Maria P' <Maria@TrinityAirAmbulance.com>
Subject: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

Good Evening Alejandro & Rosa

RE: Contract (RFP) 13-11355-CS

On Friday, February 12, 2016, we had a meeting and our Contract (RFP) 13-11355-CS - Air Ambulance Transportation was discussed.

On Thursday, February 18th, 2016, I sent an email to Alex & Maria (Trinity's office manager) advising Maria of what was discussed and agreed upon at our February 12th meeting. I provided her with the Transport Procedure for Incoming & Outgoing Patients for Jackson (see attached). The next day, Trinity commenced transportation using our Contract and Rates. The procedure as follows:

1. Incoming patients, Trinity will obtain "Financial Clearance" & Acceptance from the Jackson International or Jackson Domestic Department, and then Trinity will transport and then bill Jackson
2. Outgoing patients, Trinity will confirm health insurance coverage (for Subrogation purposes) and then Trinity will transport and then bill Jackson

Since February 18th, a total of 20 new patients have been brought to Jackson. Most if not all, have been of high acuity, requiring ICU stays.

These patients could have been accepted at other facilities.

On each and every case, Trinity obtained from the International Department (and I believe one from the Domestic Department) Financial & Medical Clearances (we have copies of emails from the International Department these "clearances" for each transfer). For cases that could not be financially cleared, we have had to transport to other facilities. Maria then sent invoices, per the Contracted rates, to Ernie, who acknowledged each one. He has requested confirmation of with whom at the Jackson International Department who provided the clearance - and we provided that information to him. He then replied to Maria that he had "approved" the invoice, for each one.

The process appeared to be flowing well so I am not sure what the hold-up is on the payments for the invoices. Can you let us know when we should expect payment. We would like to continue to refer patients to Jackson, since JHS can handle all cases & the outcomes have been positive.

In addition, I have spoken with Rosa with regards to other clients that I believe collaboratively we could approach and present Jackson as the primary care provider. Let me know when you both can meet to further discuss.

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882

Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

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From: Contreras, Alejandro E [mailto:Alejandro.Contreras@jhsmiami.org]
Sent: Friday, April 08, 2016 5:19 PM
To: Verdecia, Ernest; 'maria@trinityairambulance.com'; Corrales, Diamela
Cc: Costanzo, Rosa M; 'ingerlisa@trinityairambulance.com'
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Ernie/Diamela- We need check if patients had insurance and provide this information. If insurance does not pay we need to. Insurance info must be provided so they can bill if they can get pay

-----Original Message-----

From: Verdecia, Ernest

Sent: Friday, April 8, 2016 4:35 PM

To: 'maria@trinityairambulance.com' <maria@trinityairambulance.com>; Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>

Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'ingerlisa@trinityairambulance.com' <ingerlisa@trinityairambulance.com>

Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Maria

Yes I understand but these are international patients, after I checked with international they advised when a patient is brought into our facility you are to bill patients insurance

Since this is not my normal scope of service I turfed them to international for final approval and that's what was advised yes I gave the initial approval but its up to them for final approval since its their patient

Sorry for the confusion please call me Monday to discuss

Ernie

----- Original Message -----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]

Sent: Friday, April 08, 2016 04:12 PM

To: Verdecia, Ernest

Cc: Costanzo, Rosa M; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance' <ingerlisa@trinityairambulance.com>

Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Thanks for your reply Ernie

I am a little confused. We were advised by Mr. Alejandro Contreras to send invoices to you and you were to send for processing. And when I emailed you the invoices (and 99% are International), you have reviewed them and replied, for example:

1. For date of service January 28, 2016, patient [REDACTED] you wrote back "Approved!! We will process through our system asap" (see attached email "RE: [REDACTED] - Invoice....").
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3. For date of service March 17, 2016, patient [REDACTED] you wrote back "received thanks" (see attached email "RE: [REDACTED] ..").

Thank you in advance for the clarification of the process. We wish not to have any further delays.

Please provide an update on each of the 22 outstanding invoices as to the status of payment.

Maria

-----Original Message-----

From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhsmiami.org]
Sent: Friday, April 08, 2016 4:00 PM
To: 'maria@trinityairambulance.com'
Cc: Costanzo, Rosa M
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Maria,

I've received your invoices, however most of the patients are incoming international patients. I've forwarded these invoices to Elvia from our International department for review.

I am available Monday morning to discuss further and may possibly have an update from Elvia, please feel free to call me then.

Thanks
Ernie

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Sent: Friday, April 08, 2016 03:00 PM
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Cc: Costanzo, Rosa M; maria@trinityairambulance.com <maria@trinityairambulance.com>
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

I am following up to ensure you received my email with regards to the 22 invoices.
Can you let me know what the status is on each ?

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 Cc: Maria P
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Office: 954-771-7911
Mobile: 305-205-0570

From: Inger Lisa Skroder - Trinity Air Ambulance International
<IngerLisa@TrinityAirAmbulance.com>
Sent: Monday, April 11, 2016 7:49 PM
To: 'Contreras, Alejandro E'
Cc: 'Costanzo, Rosa M'; 'Maria P'
Subject: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance
Attachments: JHS - Transport Procedure for Incoming & Outgoing Patients for Jackson

Good Evening Alejandro & Rosa

RE: Contract (RFP) 13-11355-CS

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RE: Contract (RFP) 13-11355-CS

On Friday, February 12, 2016, we had a meeting and our Contract (RFP) 13-11355-CS - Air Ambulance Transportation was discussed.

On Thursday, February 18th, 2016, I sent an email to Alex & Maria (Trinity's office manager) advising Maria of what was discussed and agreed upon at our February 12th meeting. I provided her with the Transport Procedure for Incoming & Outgoing Patients for Jackson (see attached). The next day, Trinity commenced transportation using our Contract and Rates. The procedure as follows:

1. Incoming patients, Trinity will obtain "Financial Clearance" & Acceptance from the Jackson International or Jackson Domestic Department, and then Trinity will transport and then bill Jackson
2. Outgoing patients, Trinity will confirm health insurance coverage (for Subrogation purposes) and then Trinity will transport and then bill Jackson

Since February 18th, a total of 20 new patients have been brought to Jackson. Most if not all, have been of high acuity, requiring ICU stays.
These patients could have been accepted at other facilities.

On each and every case, Trinity obtained from the International Department (and I believe one from the Domestic Department) Financial & Medical Clearances (we have copies of emails from the International Department these "clearances" for each transfer). For cases that could not be financially cleared, we have had to transport to other facilities. Maria then sent invoices, per the Contracted rates, to Ernie, who acknowledged each one. He has requested confirmation of with whom at the Jackson International Department who provided the clearance - and we provided that information to him. He then replied to Maria that he had "approved" the invoice, for each one.

The process appeared to be flowing well so I am not sure what the hold-up is on the payments for the invoices. Can you let us know when we should expect payment. We would like to continue to refer patients to Jackson, since JHS can handle all cases & the outcomes have been positive.

In addition, I have spoken with Rosa with regards to other clients that I believe collaboratively we could approach and present Jackson as the primary care provider. Let me know when you both can meet to further discuss.

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882

Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

This transmission and any information attached to it may be confidential and is intended solely for the use of the individual or entity to which it is addressed. If you are not the intended recipient, please notify the sender immediately by calling (954) 771-7911. If you are not the intended recipient or the person responsible for delivering the transmission to the intended recipient, you are advised that any use, dissemination, forwarding, printing, or copying of this information is strictly prohibited.

-----Original Message-----

From: Contreras, Alejandro E [mailto:Alejandro.Contreras@jhsmiami.org]
Sent: Friday, April 08, 2016 5:19 PM
To: Verdecia, Ernest; 'maria@trinityairambulance.com'; Corrales, Diamela
Cc: Costanzo, Rosa M; 'ingerlisa@trinityairambulance.com'
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Ernie/Diamela- We need check if patients had insurance and provide this information. If insurance does not pay we need to. Insurance info must be provided so they can bill if they can get pay

-----Original Message-----

From: Verdecia, Ernest
Sent: Friday, April 8, 2016 4:35 PM
To: 'maria@trinityairambulance.com' <maria@trinityairambulance.com>; Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'ingerlisa@trinityairambulance.com' <ingerlisa@trinityairambulance.com>
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Maria

Yes I understand but these are international patients, after I checked with international they advised when a patient is brought into our facility you are to bill patients insurance

Since this is not my normal scope of service I turfed them to international for final approval and that's what was advised yes I gave the initial approval but its up to them for final approval since its their patient

Sorry for the confusion please call me Monday to discuss

Ernie

----- Original Message -----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Friday, April 08, 2016 04:12 PM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance'
<ingerlisa@trinityairambulance.com>
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Thanks for your reply Ernie

I am a little confused. We were advised by Mr. Alejandro Contreras to send invoices to you and you were to send for processing. And when I emailed you the invoices (and 99% are International), you have reviewed them and replied, for example:

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Thank you in advance for the clarification of the process. We wish not to have any further delays.

Please provide an update on each of the 22 outstanding invoices as to the status of payment.

Maria

-----Original Message-----

From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhsmiami.org]
Sent: Friday, April 08, 2016 4:00 PM
To: 'maria@trinityairambulance.com'
Cc: Costanzo, Rosa M
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Maria,

I've received your invoices, however most of the patients are incoming international patients. I've forwarded these invoices to Elvia from our International department for review.

I am available Monday morning to discuss further and may possibly have an update from Elvia, please feel free to call me then.

Thanks
Ernie

----- Original Message -----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Friday, April 08, 2016 03:00 PM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; maria@trinityairambulance.com <maria@trinityairambulance.com>
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

I am following up to ensure you received my email with regards to the 22 invoices.
Can you let me know what the status is on each ?

Maria

-----Original Message-----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Thursday, April 07, 2016 11:59 AM
To: 'Verdecia, Ernest'
Cc: Costanzo, Rosa M; maria@trinityairambulance.com
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

Thank you for your email. As requested please find the list of twenty two
(22) invoices. I have included the following: date of service, patient name, invoice number and amount due.

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21. March 28, 2016	[REDACTED]	16JHS0328NM	\$20,201.00	

22. March 29, 2016 [REDACTED] 16JHS0329MS \$15,999.00

Maria

-----Original Message-----

From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhs-miami.org]

Sent: Tuesday, April 05, 2016 2:16 PM

To: Inger Lisa Skroder - Trinity Air Ambulance

Cc: Maria P

Subject: RE: JHS invoices

Hi Maria and Lisa,

Please send me all invoices you have pending of patients you have brought into any Jackson facility in the past 60 days

Thanks

Ernie

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance [mailto:IngerLisa@TrinityAirAmbulance.com]

Sent: Saturday, April 02, 2016 11:43 AM

To: Verdecia, Ernest

Cc: Maria P

Subject: JHS invoices

Hi Ernie

Nice speaking with you today.

On another note, can you find out what the status is of our invoices as we have not received payment for some time.

Can we have a conference call on Thursday, April 7th to discuss the status or if you could email Maria the list - thanks !

Have a nice weekend

Inger-Lisa Skroder, MN, ARNP

Trinity Air Ambulance International

Office: 954-771-7911

Mobile: 305-205-0570

From: Inger Lisa Skroder - Trinity Air Ambulance International
<IngerLisa@TrinityAirAmbulance.com>
Sent: Friday, April 8, 2016 5:03 PM
To: Costanzo, Rosa M
Cc: 'Maria P'
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Rosa

Thank you for your time on the phone. When we met with Alex, he advised us that he wanted patients and for us to:

1. Financially & Medically clear the patients thru Jackson International or Domestic 2. Arrange transportation to Jackson 3. Then bill Jackson thru our contract

We followed the directive and steps on all cases. Maria then sent the invoices to Ernie & he replied to all of them all, stating "approved", "please process asap"...etc

So I am not sure what the issue is now for the delay in payment. We did as we were instructed to.

Can you please follow up with me on Monday, April 11, 2016 ? I would like to get paid.

Thanks

Inger Lisa

-----Original Message-----

From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhsmiami.org]
Sent: Friday, April 08, 2016 4:35 PM
To: 'maria@trinityairambulance.com'; Contreras, Alejandro E
Cc: Costanzo, Rosa M; 'ingerlisa@trinityairambulance.com'
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Maria

Yes I understand but these are international patients, after I checked with international they advised when a patient is brought into our facility you are to bill patients insurance

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Ernie

----- Original Message -----

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Sent: Friday, April 08, 2016 04:12 PM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance'

<ingerlisa@trinityairambulance.com>

Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

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Thank you in advance for the clarification of the process. We wish not to have any further delays.

Please provide an update on each of the 22 outstanding invoices as to the status of payment.

Maria

-----Original Message-----

From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhsmiami.org]

Sent: Friday, April 08, 2016 4:00 PM

To: 'maria@trinityairambulance.com'

Cc: Costanzo, Rosa M

Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Maria,

I've received your invoices, however most of the patients are incoming international patients. I've forwarded these invoices to Elvia from our International department for review.

I am available Monday morning to discuss further and may possibly have an update from Elvia, please feel free to call me then.

Thanks

Ernie

----- Original Message -----

From: Trinity Air Ambulace - Maria [mailto:maria@trinityairambulance.com]

Sent: Friday, April 08, 2016 03:00 PM

To: Verdecia, Ernest

Cc: Costanzo, Rosa M; maria@trinityairambulance.com <maria@trinityairambulance.com>
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

I am following up to ensure you received my email with regards to the 22 invoices.
Can you let me know what the status is on each ?

Maria

-----Original Message-----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Thursday, April 07, 2016 11:59 AM
To: 'Verdecia, Ernest'
Cc: Costanzo, Rosa M; maria@trinityairambulance.com
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

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From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhs-miami.org]

Sent: Tuesday, April 05, 2016 2:16 PM
To: Inger Lisa Skroder - Trinity Air Ambulance
Cc: Maria P
Subject: RE: JHS invoices

Hi Maria and Lisa,

Please send me all invoices you have pending of patients you have brought into any Jackson facility in the past 60 days

Thanks

Ernie

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance [mailto:IngerLisa@TrinityAirAmbulance.com]
Sent: Saturday, April 02, 2016 11:43 AM
To: Verdecia, Ernest
Cc: Maria P
Subject: JHS invoices

Hi Ernie

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Can we have a conference call on Thursday, April 7th to discuss the status or if you could email Maria the list - thanks !

Have a nice weekend

Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

From: Costanzo, Rosa M <RCostanz@jhsmiami.org>
Sent: Friday, April 8, 2016 5:06 PM
To: Contreras, Alejandro E
Subject: FW: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance
Attachments: RE: [REDACTED] - Invoice 16JHS0317AA from Trinity Air Ambulance International, LLC; RE: [REDACTED] Invoice 16JHS0128KS from Trinity Air Ambulance International, LLC; RE: [REDACTED] - Invoice 16JHS0219BH from Trinity Air Ambulance International, LLC

Importance: High

Alex- These invoices require payment for Trinity. There are a few like this. I believe they understand they are to bring patients bill and than go after insurance for these cases.

Rosa M. Costanzo, CMRP, CPPB, CPSM
VP/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096
Telephone: (305) 585-7333
Facsimile: (305) 585-1412
RCostanz@jhsmiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

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To: 'maria@trinityairambulance.com'
Cc: Costanzo, Rosa M
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

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Thanks
Ernie

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Inger-Lisa Skroder, MN, ARNP

Trinity Air Ambulance International

Office: 954-771-7911

Mobile: 305-205-0570

From: Alejandro.Contreras@jhsmiami.org
Sent: Friday, April 8, 2016 5:11 PM
To: RCostanz@jhsmiami.org
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Rosa - I understand but I do not process. I want to be involved only if there is a major issue. Ernie is got to handle day to day

-----Original Message-----

From: Costanzo, Rosa M
Sent: Friday, April 8, 2016 5:06 PM
To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Subject: FW: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance
Importance: High

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Rosa M. Costanzo, CMRP, CPPB, CPSM
VP/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096
Telephone: (305) 585-7333
Facsimile: (305) 585-1412
RCostanz@jhsmiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

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Cc: Costanzo, Rosa M
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Maria,

I've received your invoices, however most of the patients are incoming international patients. I've forwarded these invoices to Elvia from our International department for review.

I am available Monday morning to discuss further and may possibly have an update from Elvia, please feel free to call me then.

Thanks
Ernie

----- Original Message -----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Friday, April 08, 2016 03:00 PM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; maria@trinityairambulance.com <maria@trinityairambulance.com>
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

I am following up to ensure you received my email with regards to the 22 invoices.
Can you let me know what the status is on each ?

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Sent: Tuesday, April 05, 2016 2:16 PM
To: Inger Lisa Skroder - Trinity Air Ambulance
Cc: Maria P
Subject: RE: JHS invoices

Hi Maria and Lisa,

Please send me all invoices you have pending of patients you have brought into any Jackson facility in the past 60 days

Thanks

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Sent: Saturday, April 02, 2016 11:43 AM

To: Verdecia, Ernest

Cc: Maria P

Subject: JHS invoices

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Trinity Air Ambulance International

Office: 954-771-7911

Mobile: 305-205-0570

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Diamela.Corrales@jhsmiami.org
Cc: RCostanz@jhsmiami.org; ingerlisa@trinityairambulance.com
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Ernie/Diamela- We need check if patients had insurance and provide this information. If insurance does not pay we need to. Insurance info must be provided so they can bill if they can get pay

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From: Verdecia, Ernest
Sent: Friday, April 8, 2016 4:35 PM
To: 'maria@trinityairambulance.com' <maria@trinityairambulance.com>; Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
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Maria

Yes I understand but these are international patients, after I checked with international they advised when a patient is brought into our facility you are to bill patients insurance

Since this is not my normal scope of service I turfed them to international for final approval and that's what was advised yes I gave the initial approval but its up to them for final approval since its their patient

Sorry for the confusion please call me Monday to discuss

Ernie

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Office: 954-771-7911

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Rosa M. Costanzo, CMRP, CPPB, CPSM
VP/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096
Telephone: (305) 585-7333
Facsimile: (305) 585-1412
RCostanz@jhsmiami.org
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I want to be able to address when it is escalated. I already e mail Ernie

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Sent: Friday, April 8, 2016 6:02 PM
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Can we have a conference call on Thursday, April 7th to discuss the status or if you could email Maria the list - thanks !

Have a nice weekend

Inger-Lisa Skroder, MN, ARNP

Trinity Air Ambulance International

Office: 954-771-7911

Mobile: 305-205-0570

From: Corrales, Diamela <Diamela.Corrales@jhsmiami.org>
Sent: Monday, April 11, 2016 4:28 PM
To: Contreras, Alejandro E; Verdecia, Ernest
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

We are still working on this report, should be ready by tomorrow morning.
Thanks

Diamela Corrales
Director of International
Operations and Hospitality Services

Jackson Memorial Hospital
VUMI International Hospitality Center
Office: +1.305.355.1211 Mobile: +1.786.287.1403
24/7 JMH Direct Access On-Call: +1.305.355.1212

-----Original Message-----

From: Contreras, Alejandro E
Sent: Friday, April 08, 2016 5:19 PM
To: Verdecia, Ernest; 'maria@trinityairambulance.com'; Corrales, Diamela
Cc: Costanzo, Rosa M; 'ingerlisa@trinityairambulance.com'
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Ernie/Diamela- We need check if patients had insurance and provide this information. If insurance does not pay we need to. Insurance info must be provided so they can bill if they can get pay

-----Original Message-----

From: Verdecia, Ernest
Sent: Friday, April 8, 2016 4:35 PM
To: 'maria@trinityairambulance.com' <maria@trinityairambulance.com>; Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'ingerlisa@trinityairambulance.com' <ingerlisa@trinityairambulance.com>
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Maria

Yes I understand but these are international patients, after I checked with international they advised when a patient is brought into our facility you are to bill patients insurance

Since this is not my normal scope of service I turfed them to international for final approval and that's what was advised yes I gave the initial approval but its up to them for final approval since its their patient

Sorry for the confusion please call me Monday to discuss

Ernie

----- Original Message -----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]

Sent: Friday, April 08, 2016 04:12 PM

To: Verdecia, Ernest

Cc: Costanzo, Rosa M; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance' <ingerlisa@trinityairambulance.com>

Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Thanks for your reply Ernie

I am a little confused. We were advised by Mr. Alejandro Contreras to send invoices to you and you were to send for processing. And when I emailed you the invoices (and 99% are International), you have reviewed them and replied, for example:

1. For date of service January 28, 2016, patient [REDACTED] you wrote back "Approved!! We will process through our system asap" (see attached email "RE: [REDACTED] - Invoice....").
2. For date of service February 19, 2016, patient [REDACTED] you wrote back " Approved ! Please process asap ! Thanks" (see attached email "RE: [REDACTED] - Invoice...") and you included ghxodap.jacksonhealthsystems@na.firstsource.com)
3. For date of service March 17, 2016, patient [REDACTED] you wrote back "received thanks" (see attached email "RE: [REDACTED] ..").

Thank you in advance for the clarification of the process. We wish not to have any further delays.

Please provide an update on each of the 22 outstanding invoices as to the status of payment.

Maria

-----Original Message-----

From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhs-miami.org]

Sent: Friday, April 08, 2016 4:00 PM

To: 'maria@trinityairambulance.com'

Cc: Costanzo, Rosa M

Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Maria,

I've received your invoices, however most of the patients are incoming international patients. I've forwarded these invoices to Elvia from our International department for review.

I am available Monday morning to discuss further and may possibly have an update from Elvia, please feel free to call me then.

Thanks
Ernie

----- Original Message -----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Friday, April 08, 2016 03:00 PM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; maria@trinityairambulance.com <maria@trinityairambulance.com>
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

I am following up to ensure you received my email with regards to the 22 invoices.
Can you let me know what the status is on each ?

Maria

-----Original Message-----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Thursday, April 07, 2016 11:59 AM
To: 'Verdecia, Ernest'
Cc: Costanzo, Rosa M; maria@trinityairambulance.com
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

Thank you for your email. As requested please find the list of twenty two (22) invoices. I have included the following: date of service, patient name, invoice number and amount due.

Please advise payment status for each.

1. October 17, 2015	[REDACTED]	15JHS1017YB	\$19,920.00	
2. January 28, 2016	[REDACTED]	16JHS0128KS	\$10,000.00	
3. February 19, 2016	[REDACTED]	16JHS0219BH	\$17,254.88	
4. February 22, 2016	[REDACTED]	16JHS0222WM	\$15,134.40	
5. February 23, 2016	[REDACTED]	16JHS0223MZ		\$15,134.40
6. February 27, 2016	[REDACTED]	16JHS0226GB	\$10,089.00	
7. February 28, 2016	[REDACTED]	16JHS0228LS	\$7,185.20	
8. March 4, 2016	[REDACTED]	16JHS0303AR	\$25,055.00	
9. March 7, 2016	[REDACTED]	16JHS0307GD	\$17,272.50	
10. March 8, 2018	[REDACTED]	16JHS0308DG	\$16,922.50	
11. March 8, 2016	[REDACTED]	16JHS0308SS	\$16,922.50	
12. March 10, 2016	[REDACTED]	16JHS0310CK	\$16,772.60	
13. March 11, 2016	[REDACTED]	16JHS0311KC	\$8,740.50	
14. March 11, 2016	[REDACTED]	16JHS0311DB	\$15,682.10	
15. March 11, 2016	[REDACTED]	16JHS0311JB	\$8,673.38	
16. March 14, 2016	[REDACTED]	16JHS0314VP	\$17,159.10	
17. March 17, 2016	[REDACTED]	16JHS0317PA	\$10,675.00	
18. March 17, 2016	[REDACTED]	16JHS0317AA	\$17,632.00	
19. March 27, 2016	[REDACTED]	16JHS0327FV	\$6,742.80	
20. March 27, 2016	[REDACTED]	16JHS0327SQ	\$30,904.50	

21. March 28, 2016		16JHS0328NM	\$20,201.00
22. March 29, 2016		16JHS0329MS	\$15,999.00

Maria

-----Original Message-----

From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhsmiami.org]
Sent: Tuesday, April 05, 2016 2:16 PM
To: Inger Lisa Skroder - Trinity Air Ambulance
Cc: Maria P
Subject: RE: JHS invoices

Hi Maria and Lisa,

Please send me all invoices you have pending of patients you have brought into any Jackson facility in the past 60 days

Thanks

Ernie

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance [mailto:IngerLisa@TrinityAirAmbulance.com]
Sent: Saturday, April 02, 2016 11:43 AM
To: Verdecia, Ernest
Cc: Maria P
Subject: JHS invoices

Hi Ernie

Nice speaking with you today.

On another note, can you find out what the status is of our invoices as we have not received payment for some time.

Can we have a conference call on Thursday, April 7th to discuss the status or if you could email Maria the list - thanks !

Have a nice weekend

Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

From: ProcessFlow@jhsmiami.org
Sent: Monday, April 11, 2016 5:19 PM
To: Ernest.Verdecia@jhsmiami.org; Maria.Santiago1@jhsmiami.org;
luis.fernandez@jhsmiami.org; Alejandro.Contreras@jhsmiami.org;
arianet.gonzalez@jhsmiami.org
Cc: cedrina.murphyrusse@jhsmiami.org
Subject: Invoice: 16JHS0307GD Vendor: TRINITY AIR AMBULANCE requires your approval

Dear Invoice Approver,

Please click on the **Lawson Portal** link to open the Inbasket where you can approve this invoice below.

Company: 1000
Invoice: 16JHS0307GD ([View Invoice](#)) *Note: The invoice image is only accessible from inside the Jackson Network*
Vendor: 104364 - TRINITY AIR AMBULANCE
Amount: \$17272.50
Requester: Arianet Gonzalez
Requisition:
Cost Code: 99202 - Transportation

Please contact the Accounts Payable Department via their email or direct line should you have any questions.

Email Address: cedrina.murphyrusse@jhsmiami.org
Direct Line: (786) 466-8003

Lawson Portal

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Ref: Host:lawpa.c118.netasp.com:443 Productline: PROD901 WU#: 669997

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From: ProcessFlow@jhsmiami.org
Sent: Monday, April 11, 2016 5:21 PM
To: Ernest.Verdecia@jhsmiami.org; Maria.Santiago1@jhsmiami.org;
luis.fernandez@jhsmiami.org; Alejandro.Contreras@jhsmiami.org;
arianet.gonzalez@jhsmiami.org
Cc: cedrina.murphyrusse@jhsmiami.org
Subject: Invoice: 16JHS0308DG Vendor: TRINITY AIR AMBULANCE requires your approval

Dear Invoice Approver,

Please click on the **Lawson Portal** link to open the Inbasket where you can approve this invoice below.

Company: 1000
Invoice: 16JHS0308DG ([View Invoice](#)) *Note: The invoice image is only accessible from inside the Jackson Network*
Vendor: 104364 - TRINITY AIR AMBULANCE
Amount: \$16922.50
Requester: Arianet Gonzalez
Requisition:
Cost Code: 99202 - Transportation

Please contact the Accounts Payable Department via their email or direct line should you have any questions.

Email Address: cedrina.murphyrusse@jhsmiami.org

Direct Line: (786) 466-8003

Lawson Portal

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Ref: Host:lawpa.c118.netasp.com:443 Productline: PROD901 WU#: 669998

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From: ProcessFlow@jhsmiami.org
Sent: Monday, April 11, 2016 5:22 PM
To: Ernest.Verdecia@jhsmiami.org; Maria.Santiago1@jhsmiami.org;
luis.fernandez@jhsmiami.org; Alejandro.Contreras@jhsmiami.org;
arianet.gonzalez@jhsmiami.org
Cc: cedrina.murphyrusse@jhsmiami.org
Subject: Invoice: 16JHS0310CK Vendor: TRINITY AIR AMBULANCE requires your approval

Dear Invoice Approver,

Please click on the **Lawson Portal** link to open the Inbasket where you can approve this invoice below.

Company: 1000
Invoice: 16JHS0310CK ([View Invoice](#)) *Note: The invoice image is only accessible from inside the Jackson Network*
Vendor: 104364 - TRINITY AIR AMBULANCE
Amount: \$16772.60
Requester: Arianet Gonzalez
Requisition:
Cost Code: 99202 - Transportation

Please contact the Accounts Payable Department via their email or direct line should you have any questions.

Email Address: cedrina.murphyrusse@jhsmiami.org
Direct Line: (786) 466-8003

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From: ProcessFlow@jhsmiami.org
Sent: Monday, April 11, 2016 5:23 PM
To: Ernest.Verdecia@jhsmiami.org; Maria.Santiago1@jhsmiami.org;
luis.fernandez@jhsmiami.org; Alejandro.Contreras@jhsmiami.org;
arianet.gonzalez@jhsmiami.org
Cc: cedrina.murphyrusse@jhsmiami.org
Subject: Invoice: 16JHS0311DB Vendor: TRINITY AIR AMBULANCE requires your approval

Dear Invoice Approver,

Please click on the **Lawson Portal** link to open the Inbasket where you can approve this invoice below.

Company: 1000
Invoice: 16JHS0311DB ([View Invoice](#)) *Note: The invoice image is only accessible from inside the Jackson Network*
Vendor: 104364 - TRINITY AIR AMBULANCE
Amount: \$15682.10
Requester: Arianet Gonzalez
Requisition:
Cost Code: 99202 - Transportation

Please contact the Accounts Payable Department via their email or direct line should you have any questions.

Email Address: cedrina.murphyrusse@jhsmiami.org
Direct Line: (786) 466-8003

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From: ProcessFlow@jhsmiami.org
Sent: Monday, April 11, 2016 5:23 PM
To: Ernest.Verdecia@jhsmiami.org; Maria.Santiago1@jhsmiami.org;
luis.fernandez@jhsmiami.org; Alejandro.Contreras@jhsmiami.org;
arianet.gonzalez@jhsmiami.org
Cc: cedrina.murphyrusse@jhsmiami.org
Subject: Invoice: 16JHS0311KC Vendor: TRINITY AIR AMBULANCE requires your approval

Dear Invoice Approver,

Please click on the **Lawson Portal** link to open the Inbasket where you can approve this invoice below.

Company: 1000
Invoice: 16JHS0311KC ([View Invoice](#)) *Note: The invoice image is only accessible from inside the Jackson Network*
Vendor: 104364 - TRINITY AIR AMBULANCE
Amount: \$8740.50
Requester: Arianet Gonzalez
Requisition:
Cost Code: 99202 - Transportation

Please contact the Accounts Payable Department via their email or direct line should you have any questions.

Email Address: cedrina.murphyrusse@jhsmiami.org
Direct Line: (786) 466-8003

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From: ProcessFlow@jhsmiami.org
Sent: Monday, April 11, 2016 5:24 PM
To: Ernest.Verdecia@jhsmiami.org; Maria.Santiago1@jhsmiami.org;
luis.fernandez@jhsmiami.org; Alejandro.Contreras@jhsmiami.org;
arianet.gonzalez@jhsmiami.org
Cc: cedrina.murphyrusse@jhsmiami.org
Subject: Invoice: 16JHS0311JB Vendor: TRINITY AIR AMBULANCE requires your approval

Dear Invoice Approver,

Please click on the **Lawson Portal** link to open the Inbasket where you can approve this invoice below.

Company: 1000
Invoice: 16JHS0311JB ([View Invoice](#)) *Note: The invoice image is only accessible from inside the Jackson Network*
Vendor: 104364 - TRINITY AIR AMBULANCE
Amount: \$8673.38
Requester: Arianet Gonzalez
Requisition:
Cost Code: 99202 - Transportation

Please contact the Accounts Payable Department via their email or direct line should you have any questions.

Email Address: cedrina.murphyrusse@jhsmiami.org
Direct Line: (786) 466-8003

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From: ProcessFlow@jhsmiami.org
Sent: Monday, April 11, 2016 5:25 PM
To: Ernest.Verdecia@jhsmiami.org; Maria.Santiago1@jhsmiami.org;
luis.fernandez@jhsmiami.org; Alejandro.Contreras@jhsmiami.org;
arianet.gonzalez@jhsmiami.org
Cc: cedrina.murphyrusse@jhsmiami.org
Subject: Invoice: 16JHS0314VP Vendor: TRINITY AIR AMBULANCE requires your approval

Dear Invoice Approver,

Please click on the **Lawson Portal** link to open the Inbasket where you can approve this invoice below.

Company: 1000
Invoice: 16JHS0314VP ([View Invoice](#)) *Note: The invoice image is only accessible from inside the Jackson Network*
Vendor: 104364 - TRINITY AIR AMBULANCE
Amount: \$17159.10
Requester: Arianet Gonzalez
Requisition:
Cost Code: 99202 - Transportation

Please contact the Accounts Payable Department via their email or direct line should you have any questions.

Email Address: cedrina.murphyrusse@jhsmiami.org
Direct Line: (786) 466-8003

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Ref: Host:lawpa.c118.netasp.com:443 Productline: PROD901 WU#: 670005

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From: ProcessFlow@jhsmiami.org
Sent: Monday, April 11, 2016 5:26 PM
To: Ernest.Verdecia@jhsmiami.org; Maria.Santiago1@jhsmiami.org;
luis.fernandez@jhsmiami.org; Alejandro.Contreras@jhsmiami.org;
arianet.gonzalez@jhsmiami.org
Cc: cedrina.murphyrusse@jhsmiami.org
Subject: Invoice: 16JHS0317PA Vendor: TRINITY AIR AMBULANCE requires your approval

Dear Invoice Approver,

Please click on the **Lawson Portal** link to open the Inbasket where you can approve this invoice below.

Company: 1000
Invoice: 16JHS0317PA ([View Invoice](#)) *Note: The invoice image is only accessible from inside the Jackson Network*
Vendor: 104364 - TRINITY AIR AMBULANCE
Amount: \$10675.00
Requester: Arianet Gonzalez
Requisition:
Cost Code: 99202 - Transportation

Please contact the Accounts Payable Department via their email or direct line should you have any questions.

Email Address: cedrina.murphyrusse@jhsmiami.org

Direct Line: (786) 466-8003

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From: ProcessFlow@jhsmiami.org
Sent: Monday, April 11, 2016 5:27 PM
To: Ernest.Verdecia@jhsmiami.org; Maria.Santiago1@jhsmiami.org;
luis.fernandez@jhsmiami.org; Alejandro.Contreras@jhsmiami.org;
arianet.gonzalez@jhsmiami.org
Cc: cedrina.murphyrusse@jhsmiami.org
Subject: Invoice: 16JHS0317AA Vendor: TRINITY AIR AMBULANCE requires your approval

Dear Invoice Approver,

Please click on the **Lawson Portal** link to open the Inbasket where you can approve this invoice below.

Company: 1000
Invoice: 16JHS0317AA ([View Invoice](#)) *Note: The invoice image is only accessible from inside the Jackson Network*
Vendor: 104364 - TRINITY AIR AMBULANCE
Amount: \$17632.00
Requester: Arianet Gonzalez
Requisition:
Cost Code: 99202 - Transportation

Please contact the Accounts Payable Department via their email or direct line should you have any questions.

Email Address: cedrina.murphyrusse@jhsmiami.org
Direct Line: (786) 466-8003

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From: ProcessFlow@jhsmiami.org
Sent: Monday, April 11, 2016 5:27 PM
To: Ernest.Verdecia@jhsmiami.org; Maria.Santiago1@jhsmiami.org;
luis.fernandez@jhsmiami.org; Alejandro.Contreras@jhsmiami.org;
arianet.gonzalez@jhsmiami.org
Cc: cedrina.murphyrusse@jhsmiami.org
Subject: Invoice: 16JHS0327FV Vendor: TRINITY AIR AMBULANCE requires your approval

Dear Invoice Approver,

Please click on the **Lawson Portal** link to open the Inbasket where you can approve this invoice below.

Company: 1000
Invoice: 16JHS0327FV ([View Invoice](#)) *Note: The invoice image is only accessible from inside the Jackson Network*
Vendor: 104364 - TRINITY AIR AMBULANCE
Amount: \$6742.80
Requester: Arianet Gonzalez
Requisition:
Cost Code: 99202 - Transportation

Please contact the Accounts Payable Department via their email or direct line should you have any questions.

Email Address: cedrina.murphyrusse@jhsmiami.org

Direct Line: (786) 466-8003

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Ref: Host:lawpa.c118.netaspx.com:443 Productline: PROD901 WU#: 670008

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From: ProcessFlow@jhsmiami.org
Sent: Monday, April 11, 2016 5:28 PM
To: Ernest.Verdecia@jhsmiami.org; Maria.Santiago1@jhsmiami.org;
luis.fernandez@jhsmiami.org; Alejandro.Contreras@jhsmiami.org;
arianet.gonzalez@jhsmiami.org
Cc: cedrina.murphyrusse@jhsmiami.org
Subject: Invoice: 16JHS0327SQ Vendor: TRINITY AIR AMBULANCE requires your approval

Dear Invoice Approver,

Please click on the **Lawson Portal** link to open the Inbasket where you can approve this invoice below.

Company: 1000
Invoice: 16JHS0327SQ ([View Invoice](#)) *Note: The invoice image is only accessible from inside the Jackson Network*
Vendor: 104364 - TRINITY AIR AMBULANCE
Amount: \$30904.50
Requester: Arianet Gonzalez
Requisition:
Cost Code: 99202 - Transportation

Please contact the Accounts Payable Department via their email or direct line should you have any questions.

Email Address: cedrina.murphyrusse@jhsmiami.org
Direct Line: (786) 466-8003

Lawson Portal

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Ref: Host:lawpa.c118.netasp.com:443 Productline: PROD901 WU#: 670010

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From: ProcessFlow@jhsmiami.org
Sent: Monday, April 11, 2016 5:29 PM
To: Ernest.Verdecia@jhsmiami.org; Maria.Santiago1@jhsmiami.org;
luis.fernandez@jhsmiami.org; Alejandro.Contreras@jhsmiami.org;
arianet.gonzalez@jhsmiami.org
Cc: cedrina.murphyrusse@jhsmiami.org
Subject: Invoice: 16JHS0328NM Vendor: TRINITY AIR AMBULANCE requires your approval

Dear Invoice Approver,

Please click on the **Lawson Portal** link to open the Inbasket where you can approve this invoice below.

Company: 1000
Invoice: 16JHS0328NM ([View Invoice](#)) *Note: The invoice image is only accessible from inside the Jackson Network*
Vendor: 104364 - TRINITY AIR AMBULANCE
Amount: \$20201.00
Requester: Arianet Gonzalez
Requisition:
Cost Code: 99202 - Transportation

Please contact the Accounts Payable Department via their email or direct line should you have any questions.

Email Address: cedrina.murphyrusse@jhsmiami.org
Direct Line: (786) 466-8003

Lawson Portal

Please do not reply to this Email. This notification is generated by ProcessFlow - Lawson Software.
Ref: Host:lawpa.c118.netasp.com:443 Productline: PROD901 WU#: 670011

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From: ProcessFlow@jhsmiami.org
Sent: Monday, April 11, 2016 5:30 PM
To: Ernest.Verdecia@jhsmiami.org; Maria.Santiago1@jhsmiami.org;
luis.fernandez@jhsmiami.org; Alejandro.Contreras@jhsmiami.org;
arianet.gonzalez@jhsmiami.org
Cc: cedrina.murphyrusse@jhsmiami.org
Subject: Invoice: 16JHS0304AR Vendor: TRINITY AIR AMBULANCE requires your approval

Dear Invoice Approver,

Please click on the **Lawson Portal** link to open the Inbasket where you can approve this invoice below.

Company: 1000
Invoice: 16JHS0304AR ([View Invoice](#)) *Note: The invoice image is only accessible from inside the Jackson Network*
Vendor: 104364 - TRINITY AIR AMBULANCE
Amount: \$25055.00
Requester: Arianet Gonzalez
Requisition:
Cost Code: 99202 - Transportation

Please contact the Accounts Payable Department via their email or direct line should you have any questions.

Email Address: cedrina.murphyrusse@jhsmiami.org
Direct Line: (786) 466-8003

Lawson Portal

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Ref: Host:lawpa.c118.netaspx.com:443 Productline: PROD901 WU#: 670013

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From: ProcessFlow@jhsmiami.org
Sent: Monday, April 11, 2016 5:30 PM
To: Ernest.Verdecia@jhsmiami.org; Maria.Santiago1@jhsmiami.org;
luis.fernandez@jhsmiami.org; Alejandro.Contreras@jhsmiami.org;
arianet.gonzalez@jhsmiami.org
Cc: cedrina.murphyrusse@jhsmiami.org
Subject: Invoice: 16JHS0329MS Vendor: TRINITY AIR AMBULANCE requires your approval

Dear Invoice Approver,

Please click on the **Lawson Portal** link to open the Inbasket where you can approve this invoice below.

Company: 1000
Invoice: 16JHS0329MS ([View Invoice](#)) *Note: The invoice image is only accessible from inside the Jackson Network*
Vendor: 104364 - TRINITY AIR AMBULANCE
Amount: \$15999.00
Requester: Arianet Gonzalez
Requisition:
Cost Code: 99202 - Transportation

Please contact the Accounts Payable Department via their email or direct line should you have any questions.

Email Address: cedrina.murphyrusse@jhsmiami.org
Direct Line: (786) 466-8003

Lawson Portal

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From: ProcessFlow@jhsmiami.org
Sent: Monday, April 11, 2016 5:31 PM
To: Ernest.Verdecia@jhsmiami.org; Maria.Santiago1@jhsmiami.org;
luis.fernandez@jhsmiami.org; Alejandro.Contreras@jhsmiami.org;
arianet.gonzalez@jhsmiami.org
Cc: cedrina.murphyrusse@jhsmiami.org
Subject: Invoice: 16JHS0223MZ Vendor: TRINITY AIR AMBULANCE requires your approval

Dear Invoice Approver,

Please click on the **Lawson Portal** link to open the Inbasket where you can approve this invoice below.

Company: 1000
Invoice: 16JHS0223MZ ([View Invoice](#)) *Note: The invoice image is only accessible from inside the Jackson Network*
Vendor: 104364 - TRINITY AIR AMBULANCE
Amount: \$15134.40
Requester: Arianet Gonzalez
Requisition:
Cost Code: 99202 - Transportation

Please contact the Accounts Payable Department via their email or direct line should you have any questions.

Email Address: cedrina.murphyrusse@jhsmiami.org

Direct Line: (786) 466-8003

Lawson Portal

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From: ProcessFlow@jhsmiami.org
Sent: Monday, April 11, 2016 5:31 PM
To: Ernest.Verdecia@jhsmiami.org; Maria.Santiago1@jhsmiami.org;
luis.fernandez@jhsmiami.org; Alejandro.Contreras@jhsmiami.org;
arianet.gonzalez@jhsmiami.org
Cc: cedrina.murphyrusse@jhsmiami.org
Subject: Invoice: 16JHS0227GB Vendor: TRINITY AIR AMBULANCE requires your approval

Dear Invoice Approver,

Please click on the **Lawson Portal** link to open the Inbasket where you can approve this invoice below.

Company: 1000
Invoice: 16JHS0227GB ([View Invoice](#)) *Note: The invoice image is only accessible from inside the Jackson Network*
Vendor: 104364 - TRINITY AIR AMBULANCE
Amount: \$10089.00
Requester: Arianet Gonzalez
Requisition:
Cost Code: 99202 - Transportation

Please contact the Accounts Payable Department via their email or direct line should you have any questions.

Email Address: cedrina.murphyrusse@jhsmiami.org
Direct Line: (786) 466-8003

Lawson Portal

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From: Alvarez, Fidel <FAlvarez@jhsmiami.org>
Sent: Monday, April 11, 2016 6:02 PM
To: Trinity Air Ambulance - Maria
Subject: RE: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

You too , Thanks

Fidel Alvarez, C.R.C.S.T., CPPB
Procurement Manager
Procurement Management

Jackson Memorial Hospital
1500 N.W 12th Avenue
Miami, FL 33136-1096
Phone: 305-585-7058
Fax: 305-355-2303
falvarez@jhsmiami.org

Supplier Portal

Jackson Health System is now using an electronic procurement solicitation system. Please access our Supplier Portal using the following link to review and respond to solicitations:

Please note that you will be able to view open solicitations by clicking on the BROWSE OPEN EVENTS link. In order to respond electronically to a solicitation, you will need to create a no fee account. You can create an account by clicking the following link:
<http://www.jacksonhealth.org/vendors-supplier-portal.asp>

Please know that this does not take the place of the Public Health Trust's Vendor Registration which is required for the award of all contracts. The vendor registration application can be found on the JHS website via the following link: [Vendor Registration](#)

Jackson Health System is part of the Reptax vendor credentialing community. All vendors who wish to gain access to our facilities are required to register by visiting www.Reptax.com

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Monday, April 11, 2016 5:55 PM
To: Alvarez, Fidel; Figueroa, Andrew J
Cc: Kimmelman, Gila L; maria@trinityairambulance.com
Subject: RE: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

Thank you Fidel

I will look for the email for electronic payment.

Have a nice evening

Maria

From: Alvarez, Fidel [<mailto:FAlvarez@jhsmiami.org>]
Sent: Monday, April 11, 2016 5:31 PM
To: Trinity Air Ambulance - Maria; Figueroa, Andrew J
Cc: Kimmelman, Gila L
Subject: RE: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

Hello Maria,

There was a payment for inv 16jhs0128 in the amount of 13,710.65 that was paid electronically, were you able to pull the payment?

Also today you will get electronically a payment in the amount of 39,282.10. Paid with PMS payment# 2003127. I will get the rest of the invoices paid by tomorrow.

We are also working on getting the other pending invoices that are related to po 8108421 SERV paid.

I'll keep you posted tomorrow.

Fidel Alvarez, C.R.C.S.T., CPPB
Procurement Manager
Procurement Management

Jackson Memorial Hospital
1500 N.W 12th Avenue
Miami, FL 33136-1096
Phone: 305-585-7058
Fax: 305-355-2303
falvarez@jhsmiami.org

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Jackson Health System is part of the Reptrax vendor credentialing community. All vendors who wish to gain access to our facilities are required to register by visiting www.Reptrax.com

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Monday, April 11, 2016 2:34 PM
To: Figueroa, Andrew J; Alvarez, Fidel
Cc: Kimmelman, Gila L; maria@trinityairambulance.com
Subject: RE: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

Thanks Andrew

Fidel said it may ready today. Please process thru the electronic system (Well Fargo)

Maria

From: Figueroa, Andrew J [<mailto:Andrew.Figueroa@jhsmiami.org>]
Sent: Monday, April 11, 2016 2:36 PM
To: 'Trinity Air Ambulance - Maria'; Alvarez, Fidel
Cc: Kimmelman, Gila L
Subject: RE: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

Hi Maria – the form and relative REQ is working its way through the approval process of our Health System. I anticipate the check to be issued this week

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Monday, April 11, 2016 2:10 PM
To: Figueroa, Andrew J <Andrew.Figueroa@jhsmiami.org>; Alvarez, Fidel <FAlvarez@jhsmiami.org>
Cc: maria@trinityairambulance.com
Subject: RE: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

Good Afternoon Andrew & Fidel

Do you have any update for me?

Maria

From: Figueroa, Andrew J [<mailto:Andrew.Figueroa@jhsmiami.org>]
Sent: Friday, April 08, 2016 3:30 PM
To: 'Trinity Air Ambulance - Maria'; Alvarez, Fidel
Cc: Scott, Laura J; Costanzo, Rosa M
Subject: RE: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

Hi Fidel – I know you received the necessary forms late, but could you give us a status update?

Thanks,
Andrew

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Friday, April 8, 2016 3:08 PM
To: Figueroa, Andrew J <Andrew.Figueroa@jhsmiami.org>
Cc: Scott, Laura J <Laura.Scott@jhsmiami.org>; Costanzo, Rosa M <RCostanz@jhsmiami.org>;
maria@trinityairambulance.com
Subject: RE: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

Good Afternoon Andres

I am checking to see If you received my email with regards to the eleven invoices. We you able to get an “emergency process” so we could get paid ?

Thank you

Maria

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Thursday, April 07, 2016 12:09 PM
To: 'Figueroa, Andrew J'
Cc: 'Scott, Laura J'; 'Costanzo, Rosa M'; maria@trinityairambulance.com
Subject: RE: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

Good Afternoon Andrew

Do you have an update on the status of payment for the eleven (11) invoices ?

Maria

From: Figueroa, Andrew J [<mailto:Andrew.Figueroa@jhsiami.org>]
Sent: Wednesday, March 30, 2016 9:54 PM
To: 'Inger Lisa Skroder - Trinity Air Ambulance'
Cc: Scott, Laura J; Costanzo, Rosa M; 'Maria@trinityairambulance.com'
Subject: RE: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

Hi Lisa- we're going to try paying via emergency process.

Sent with Good (www.good.com)

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance [IngerLisa@TrinityAirAmbulance.com]
Sent: Wednesday, March 30, 2016 02:36 PM Eastern Standard Time
To: Figueroa, Andrew J
Cc: Scott, Laura J; Costanzo, Rosa M; Maria@trinityairambulance.com
Subject: Re: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

Thanks Andrew

The April Board meeting is not for a week or two ?

Anyway we can get an "emergency" increase request since - invoices are outstanding & there most likely be flights - and none of us want to turn down organ(s) because funding is now there ?

Let me know

Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

On Mar 30, 2016, at 14:12, Figueroa, Andrew J <Andrew.Figueroa@jhsiami.org> wrote:

Thanks Laura. I'll approve in Lawson as soon as the back up is squared away

Lisa- I was told earlier today the PO increase is on for the April Board meeting. Once approved, the PO will be increased and the invoices below paid. We'll make every effort to exhaust the current PO

Sent with Good (www.good.com)

-----Original Message-----

From: Scott, Laura J

Sent: Wednesday, March 30, 2016 01:39 PM Eastern Standard Time

To: Costanzo, Rosa M; Figueroa, Andrew J

Cc: 'Inger Lisa SKRODER, MN, ARNP'; Scott, Laura J

Subject: RE: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

16JHS0210 – Pending approval in Lawson; does not have enough funds on Line 9 of PO8108937 SERV

16JHS0218 - Does not have enough funds on Line 8 of PO8108937 SERV

16JHS0219 – Pending approval in Lawson; does not have enough funds on Line 12 of PO8108937 SERV

16JHS0223 - Does not have enough funds on any line of the PO; what line should be used for multiple organs

Above is the breakdown of the assistance that is needed from Procurement and the Dept.

Thanks!

Laura Scott

Payroll Manager, Finance Department

Account Payable Manager, Finance Department

Jackson Health Systems

JMT Suite 1015, Payroll

JMT Suite 816, Accounts Payable

1500 NW 12 Ave

Miami, FL 33136

Phone: 786-466-8000 Payroll

Phone: 786-466-8003 Account Payable

Fax: 305-355-1500

Laura.Scott@JHSMiami.org

From: Costanzo, Rosa M

Sent: Wednesday, March 30, 2016 1:02 PM

To: Scott, Laura J; Figueroa, Andrew J

Cc: 'Inger Lisa SKRODER, MN, ARNP'

Subject: FW: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

Laura- Please help us get approved invoices processed for payment ASAP.

Thank you

Kindest regards,

Rosa Costanzo, CMRP, CPPB, CPSM

VP Strategic Sourcing & Supply Chain Mgmt/ Chief Procurement Officer

Jackson Health System

305-585-7333

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International
[IngerLisa@TrinityAirAmbulance.com]
Sent: Tuesday, March 29, 2016 10:58 AM Eastern Standard Time
To: Costanzo, Rosa M
Subject: FW: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

Rosa

Can you see if we can get paid ?

Thank you,

Inger Lisa Skroder, MN, ARNP

Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308

Ph: 954-771-7911

Cell: 305-205-0570

Fax: 954-771-4882

<image007.jpg>

Email: IngerLisa@TrinityAirAmbulance.com

Website: www.TrinityAirAmbulance.com

<image008.png> <image009.png> <image010.png> <image011.png> <image012.png>

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From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Tuesday, March 29, 2016 10:39 AM
To: 'Figueroa, Andrew J'
Cc: 'Wu, Kwok-fai'; maria@trinityairambulance.com
Subject: RE: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

Good Morning Andrew,

Thank you for your prompt reply.

Please find attached all of the initial invoice submissions that already have this information included.

1. Invoice# 16JHS0210 see attached submission from February 16th that has receipts for landing fees \$632.50 at TJSJ at MI, \$48.28 at MIA and a receipt for \$28.42 catering included in the attachment.
2. Invoice# 16JHS0218 – Form was requested but it was never provided to us from your Organ Donor Desk – for future flights we will not be dispatching our pilots and aircraft until this form is received from your organ donor desk
3. Invoice# 16JHS0219 – Please see attached request for Flight Form from your Organ Desk; The \$325.00 is our fee for brokering/coordination of the ground ambulance as per contract
4. Invoice# 16JHS0223 – Please see attached Flight Request Form from your organ donor desk

Andrew, please confirm that all necessary paperwork to process these invoices is received and advise us when we can expect payment for these invoices as previously stated total balance due is \$180,474.89.

Kind Regards,

Maria Pejdanovska

Trinity Air Ambulance International, LLC
3535 Galt Ocean Drive

Fort Lauderdale, Florida 33308

Ph: 954-771-7911

Fax: 954-771-4882

<image013.jpg>

Email: Maria@TrinityAirAmbulance.com

Website: www.TrinityAirAmbulance.com

<image008.png> <image009.png> <image010.png> <image011.png>



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From: Figueroa, Andrew J [<mailto:Andrew.Figueroa@jhs-miami.org>]
Sent: Monday, March 28, 2016 5:33 PM
To: 'Trinity Air Ambulance - Maria'
Cc: Wu, Kwok-fai
Subject: RE: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

Hi Maria,

Below are the details behind the missing backup invoices. Please send them to Steve so we can amend our records and approve.

1. February 10, 2015 Organ Transport (FxE-MIA-TJSJ-MIA-FxE)
16JHS0210 \$18,117.74 missing backup: charter flight sheet, 3 receipts for landing fees \$632.50 at TJSJ at MI, \$48.28 at MIA and a receipt for \$28.42 catering
2. February 18, 2016 Organ Transport (MIA-Gainesville -MIA)
16JHS0218 \$15,925.00 missing backup: missing charter flight sheet
3. February 18, 2016 Organ Transport AA (FxE-San Juan-MIA)
16JHS0219 \$36,213.75 missing backup: charter flight sheet, missing copy of receipt for \$325 ground ambulance
4. February 23, 2016 Organ Transport (FxE-LIT-FxE)
16JHS0223 \$13,659.43 missing backup: charter flight sheet

Thanks,

Andrew

From: Figueroa, Andrew J

Sent: Monday, March 28, 2016 5:31 PM

To: 'Trinity Air Ambulance - Maria' <maria@trinityairambulance.com>; Scott, Laura J <Laura.Scott@jhsmiami.org>

Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance' <ingerlisa@trinityairambulance.com>; Bennett, Meghan C.

<meghan.bennett@jhsmiami.org>; Dort, Kimberly <Kimberly.Dort@jhsmiami.org>

Subject: RE: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

Hi Maria – below are my comments in red with status updates. Many are approved and awaiting payment. 4 of them are missing backup – I'll send you details on those under separate cover

Hi Laura – could you process the “approved” ones below for payment this week? For any that might go over the current PO, I believe the funds should be increased as early as next week.

Below are the details behind the missing backup invoices. Please send them to Steve so we can amend our records and approve.

1. February 10, 2015 Organ Transport (FXE-MIA-TJSJ-MIA-FXE) 16JHS0210 \$18,117.74 missing backup: charter flight sheet, 3 receipts for landing fees \$632.50 at TJSJ at MI, \$48.28 at MIA and a receipt for \$28.42 catering
2. February 18, 2016 Organ Transport (MIA-Gainesville -MIA) 16JHS0218 \$15,925.00 missing backup: missing charter flight sheet
3. February 18, 2016 Organ Transport AA (FXE-San Juan-MIA) 16JHS0219 \$36,213.75 missing backup: charter flight sheet, missing copy of receipt for \$325 ground ambulance
4. February 23, 2016 Organ Transport (FXE-LIT-FXE) 16JHS0223 \$13,659.43 missing backup: charter flight sheet

Thanks,

Andrew

From: Figueroa, Andrew J

Sent: Monday, March 28, 2016 5:31 PM

To: 'Trinity Air Ambulance - Maria' <maria@trinityairambulance.com>; Scott, Laura J <Laura.Scott@jhsmiami.org>

Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance' <ingerlisa@trinityairambulance.com>; Bennett, Meghan C. <meghan.bennett@jhsmiami.org>; Dort, Kimberly <Kimberly.Dort@jhsmiami.org>

Subject: RE: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

Hi Maria – below are my comments in red with status updates. Many are approved and awaiting payment. 4 of them are missing backup – I'll send you details on those under separate cover

Hi Laura – could you process the “approved” ones below for payment this week? For any that might go over the current PO, I believe the funds should be increased as early as next week.

Thanks,

Andrew

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Monday, March 28, 2016 4:28 PM
To: Figueroa, Andrew J <Andrew.Figueroa@jhs-miami.org>; Bennett, Meghan C. <meghan.bennett@jhs-miami.org>
Cc: Costanzo, Rosa M <RCostanz@jhs-miami.org>; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance' <ingerlisa@trinityairambulance.com>; maria@trinityairambulance.com
Subject: RE: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

Good Afternoon Andrew,

We still have 11 unpaid invoices for organ transports that we have completed and as you can see some of them date back to August 2015.

Can you please advise us what is the payment status on these invoices, there seems to be a delay in processing these payments to us so please advise us what we can do on our end to speed up the process.

The total due amount is \$180,474.89.

1. August 11, 2015 Organ Transport (FXE-San Juan
) 15JHS0811 \$13,174.88 approved; AP is processing
2. September 26, 2015 Organ Transport (FXE-MIA-BHM-MIA-FXE
) 15JHS0926C \$14,159.69 approved; AP is processing
3. December 2, 2016 Organ Transport (FXE-MIA-FXE
) 15JHS1202 \$21,373.95 invoice date on this is 3/9/16
4. February 10, 2015 Organ Transport (FXE-MIA-TJSJ-MIA-
FXE) 16JHS0210 \$18,117.74 missing backup
5. February 13, 2016 Organ Transport (FXE-MIA-APF-MIA-
FXE) 16JHS0213 \$9,769.24 approved; AP is processing

6. February 18, 2016 Organ Transport (MIA-Gainesville -MIA)
16JHS0218 \$15,925.00 missing backup
7. February 18, 2016 Organ Transport AA (FXE-San Juan-MIA)
16JHS0219 \$36,213.75 missing backup
8. February 21, 2016 Organ Transport (FXE-MIA-BHM-MIA-FXE)
16JHS0221 \$15,492.04 approved; AP is processing
9. February 23, 2016 Organ Transport (FXE-LIT-FXE)
16JHS0223 \$13,659.43 missing backup
10. February 26, 2016 Organ Transport (Memorial - Jackson)
16JHS0226 \$5,725.00 approved; AP is processing
11. March 1, 2016 Organ Transport (FXE-MIA-JAN-MIA-FXE)
16JHS0301 \$16,864.17 approved; AP is processing

Kind Regards,

Maria Pejdanovska

Trinity Air Ambulance International, LLC
3535 Galt Ocean Drive

Fort Lauderdale, Florida 33308

Ph: 954-771-7911
Fax: 954-771-4882

<image013.jpg>

Email: Maria@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

<image008.png> <image009.png> <image010.png> <image011.png>



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From: Inger Lisa Skroder - Trinity Air Ambulance International
[mailto:IngerLisa@TrinityAirAmbulance.com]
Sent: Monday, March 14, 2016 11:05 AM
To: 'Figuroa, Andrew J'
Cc: 'Maria P'
Subject: JHS- ORGAN Invoices - Payment Status for Eleven (11) Invoices

Andrew

Do you have time to speak with us to review the following 11 invoices?

Or can you email us with a status of each ?

1. August 11, 2015 Organ Transport (FXE-San Juan) Cancelled JHS-
Organ **15JHS0811** \$13,174.88 Invoice emailed August 27, 2015

- Approved;

2. September 26, 2015 Organ Transport (FXE-MIA-BHM-MIA-FXE) Cancelled
Flight JHS-Organ **15JHS0926C** \$14,159.69 Invoice emailed October 7,
2015

3. January 28, 2016 Organ Transport (FXE - SHV-FXE) JHS-
Organ **16JHS0128** \$13,710.65 February 3, 2016 invoice emailed

4. February 10, 2015 Organ Transport (FXE-MIA-TJSJ-MIA-FXE) JHS-
Organ **16JHS0210** \$18,117.74 February 16, 2016 invoice emailed

5. February 13, 2016 Organ Transport (FXE-MIA-APF-MIA-
FXE) JHS **16JHS0213** \$9,769.24 March 8, 2016 invoice emailed

6. February 18, 2016 Organ Transport (MIA-Gainesville -MIA) Hop-A-Jet JHS-
Organ **16JHS0218** \$15,925.00 February 19, 2016 invoice emailed

7. February 18, 2016 Organ Transport AA (FXE-San Juan-MIA) Hop-A-Jet JHS-
Organ **16JHS0219** \$36,213.75 February 19, 2016 invoice emailed

8 February 21, 2016 Organ Transport (FXE-MIA-BHM-MIA-
FXE) JHS **16JHS0221** \$15,492.04 March 8, 2016 invoice emailed

9. February 23, 2016 Organ Transport (FXE-LIT-FXE
) JHS **16JHS0223** \$13,659.43 March 8, 2016 invoice emailed

10. February 26, 2016 Organ Transport (Memorial - Jackson) Helicopter JHS-
Organ **16JHS0226** \$5,725.00 March 3, 2016 invoice emailed

11. March 1, 2016 Organ Transport (FX-MIA-JAN-MIA-
FXE) JHS **16JHS0301** JHS-ORGAN \$16,864.17 March 8, 2016 invoice emailed

Inger Lisa Skroder, MN, ARNP

Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308

Ph: 954-771-7911

Cell: 305-205-0570

Fax: 954-771-4882

<image007.jpg>

Email: IngerLisa@TrinityAirAmbulance.com

Website: www.TrinityAirAmbulance.com

<image008.png> <image009.png> <image010.png> <image011.png>



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From: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Sent: Monday, April 11, 2016 6:10 PM
To: Alvarez, Fidel
Subject: Re: RE:

Nothing more came through

Sent from my iPhone

On Apr 11, 2016, at 5:36 PM, Alvarez, Fidel <FAlvarez@jhsmiami.org> wrote:

Thank you ill check if not it will have to be tomorrow , thank you , and have a wonderful Birthday

HAPPY BIRTHDAY MY FRIEND!!!!!!

Fidel Alvarez, C.R.C.S.T., CPPB
Procurement Manager
Procurement Management

Jackson Memorial Hospital
1500 N.W 12th Avenue
Miami, FL 33136-1096
Phone: 305-585-7058
Fax: 305-355-2303
falvarez@jhsmiami.org

Supplier Portal

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From: Contreras, Alejandro E
Sent: Monday, April 11, 2016 5:34 PM
To: Alvarez, Fidel
Subject: RE:

I think I got them all. I have nothing in my inbox or coming in. My Bday today so I am leaving now. I waited but I am not getting anything more.

From: Alvarez, Fidel
Sent: Monday, April 11, 2016 4:40 PM
To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Subject:

Exec vp link to approve the req please 997580

Fidel Alvarez, C.R.C.S.T., CPPB
Procurement Manager
Procurement Management

Jackson Memorial Hospital
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Miami, FL 33136-1096
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Subject:

Exec vp link to approve the req please 997580

Fidel Alvarez, C.R.C.S.T., CPPB
Procurement Manager
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From: Elvia.Armengol1@jhsmiami.org
Sent: Monday, April 11, 2016 5:57 PM
To: Diamela.Corrales@jhsmiami.org
Subject: PLEASE REVIEW INFO ----- RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Good afternoon Diamela,

As noted as follows in the list received from Trinity, all international transfers were insured. It is confusing as all Air Ambulance companies obtain their our pre-authorization for payment directly from the insurance companies in order to cover their services, also insurance information was provided by Trinity to JMH (we had never received copies of any invoices from Trinity in past). In some cases patients have Medicare and usual practice since Medicare does not cover transfers is that the AA collects funds from the member/family for AA services. Therefore, not sure why JMH is being billed but in any case please note below (Trinity also needs to keep in mind insurances usual take up to 120 days from the date of receipt of clean claim and none of the below have passed that time frame, if they already billed).

Hope this information is of assistance.

1. October 17, 2015	[REDACTED] 15JHS1017YB	\$19,920.00	PATIENT NOT FOUND
2. January 28, 2016	[REDACTED] 16JHS0128KS	\$10,000.00	PATIENT NOT FOUND
3. February 19, 2016	[REDACTED] 16JHS0219BH	\$17,254.88	UHC Shared Services / J-MAIN
4. February 22, 2016	[REDACTED] 16JHS0222WM	\$15,134.40	MEDICARE / J-NORTH
5. February 23, 2016	[REDACTED] 16JHS0223MZ	\$15,134.40	COVENTRYONE PPO / J-MAIN
6. February 27, 2016	[REDACTED] 16JHS0226GB	\$10,089.00	BC/BS HMO - DMG HEALTH
PAAARTNERS / J-NORTH			
7. February 28, 2016	[REDACTED] 16JHS0228LS	\$7,185.20	INSURED DOMESTIC TRANSFER
FROM KEY WEST / J-MAIN			
8. March 4, 2016	[REDACTED] 16JHS0303AR	\$25,055.00	AETNA - I.B.E.W.LOCAL 269
WELFARE FUND ; 2 ND MEDICARE / J-MAIN			
9. March 7, 2016	[REDACTED] 16JHS0307GD	\$17,272.50	AMBETTER / J-MAIN
10. March 8, 2018	[REDACTED] 16JHS0308DG	\$16,922.50	1199 SEIU BENEFIT FUND / J-MAIN
11. March 8, 2016	[REDACTED] 16JHS0308SS	\$16,922.50	HEALTH FIRST HMO / J-MAIN
12. March 10, 2016	[REDACTED] 16JHS0310CK	\$16,772.60	PATIENT NOT FOUND
13. March 11, 2016	[REDACTED] 16JHS0311KC	\$8,740.50	BC/BS - EPO / J-MAIN
14. March 11, 2016	[REDACTED] 16JHS0311DB	\$15,682.10	PARAMOUNT ELITE - HMO / J-NORTH
15. March 11, 2016	[REDACTED] 16JHS0311JB	\$8,673.38	BC/BS - ATHEM MEDICAL MANAGEMENT / J-
NORTH			
16. March 14, 2016	[REDACTED] 16JHS0314VP	\$17,159.10	TUGO Travel Policy / J-NORTH
17. March 17, 2016	[REDACTED] 16JHS0317PA	\$10,675.00	MEDICARE & AARP / J-MAIN
18. March 17, 2016	[REDACTED] 16JHS0317AA	\$17,632.00	HEALTHFIRST HEALTH PLAN - MEDICARE /
J-MAIN			
19. March 27, 2016	[REDACTED] 16JHS0327FV	\$6,742.80	MEDICARE & HARVARD MEDICARE
SUPPLEMENT / J-NORTH			
20. March 27, 2016	[REDACTED] 16JHS0327SQ	\$30,904.50	UHC ACCESS / J-MAIN
21. March 28, 2016	[REDACTED] 16JHS0328NM	\$20,201.00	MEDICARE & FL MEDICAID / J-MAIN
22. March 29, 2016	[REDACTED] 16JHS0329MS	\$15,999.00	MEDICAID OF NY - HMO / J-NORTH



Elvia Armengol

Supervisor of International Operations



Main#: (305) 355-1212

Cell# 786-393-3783

Fax: (305) 585-6833

elvia.armengol1@jhsmiami.org

internationaltransfer@jhsmiami.org

From: Corrales, Diamela

Sent: Friday, April 08, 2016 8:47 PM

To: Armengol, Elvia M

Subject: FW: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Did you check if they were all insured?

Thanks

Sent with Good (www.good.com)

-----Original Message-----

From: Contreras, Alejandro E

Sent: Friday, April 08, 2016 05:19 PM Eastern Standard Time

To: Verdecia, Ernest; 'maria@trinityairambulance.com'; Corrales, Diamela

Cc: Costanzo, Rosa M; 'ingerlisa@trinityairambulance.com'

Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Ernie/Diamela- We need check if patients had insurance and provide this information. If insurance does not pay we need to. Insurance info must be provided so they can bill if they can get pay

-----Original Message-----

From: Verdecia, Ernest

Sent: Friday, April 8, 2016 4:35 PM

To: 'maria@trinityairambulance.com' <maria@trinityairambulance.com>; Contreras, Alejandro E

<Alejandro.Contreras@jhsmiami.org>

Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'ingerlisa@trinityairambulance.com' <ingerlisa@trinityairambulance.com>

Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Maria

Yes I understand but these are international patients, after I checked with international they advised when a patient is brought into our facility you are to bill patients insurance

Since this is not my normal scope of service I turfed them to international for final approval and that's what was advised yes I gave the initial approval but its up to them for final approval since its their patient

Sorry for the confusion please call me Monday to discuss

Ernie

----- Original Message -----

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Friday, April 08, 2016 04:12 PM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance' <ingerlisa@trinityairambulance.com>
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Thanks for your reply Ernie

I am a little confused. We were advised by Mr. Alejandro Contreras to send invoices to you and you were to send for processing. And when I emailed you the invoices (and 99% are International), you have reviewed them and replied, for example:

1. For date of service January 28, 2016, patient [REDACTED] you wrote back "Approved!! We will process through our system asap" (see attached email "RE: [REDACTED] - Invoice....").
2. For date of service February 19, 2016, patient [REDACTED] you wrote back " Approved ! Please process asap ! Thanks" (see attached email "RE: [REDACTED] - Invoice...") and you included ghxodap.jacksonhealthsystems@na.firstsource.com)
3. For date of service March 17, 2016, patient [REDACTED] you wrote back "received thanks" (see attached email "RE: [REDACTED] ..").

Thank you in advance for the clarification of the process. We wish not to have any further delays.

Please provide an update on each of the 22 outstanding invoices as to the status of payment.

Maria

-----Original Message-----

From: Verdecia, Ernest [<mailto:Ernest.Verdecia@jhs-miami.org>]
Sent: Friday, April 08, 2016 4:00 PM
To: 'maria@trinityairambulance.com'
Cc: Costanzo, Rosa M
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Maria,

I've received your invoices, however most of the patients are incoming international patients. I've forwarded these invoices to Elvia from our International department for review.

I am available Monday morning to discuss further and may possibly have an update from Elvia, please feel free to call me then.

Thanks
Ernie

----- Original Message -----

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Friday, April 08, 2016 03:00 PM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; maria@trinityairambulance.com <maria@trinityairambulance.com>
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

I am following up to ensure you received my email with regards to the 22 invoices.
Can you let me know what the status is on each ?

Maria

-----Original Message-----

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Thursday, April 07, 2016 11:59 AM
To: 'Verdecia, Ernest'
Cc: Costanzo, Rosa M: maria@trinityairambulance.com
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

Thank you for your email. As requested please find the list of twenty two
(22) invoices. I have included the following: date of service, patient name, invoice number and amount due.

Please advise payment status for each.

1. October 17, 2015	15JHS1017YB	\$19,920.00
2. January 28, 2016	16JHS0128KS	\$10,000.00
3. February 19, 2016	16JHS0219BH	\$17,254.88
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11. March 8, 2016	16JHS0308SS	\$16,922.50
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13. March 11, 2016	16JHS0311KC	\$8,740.50
14. March 11, 2016	16JHS0311DB	\$15,682.10
15. March 11, 2016	16JHS0311JB	\$8,673.38
16. March 14, 2016	16JHS0314VP	\$17,159.10
17. March 17, 2016	16JHS0317PA	\$10,675.00
18. March 17, 2016	16JHS0317AA	\$17,632.00
19. March 27, 2016	16JHS0327FV	\$6,742.80
20. March 27, 2016	16JHS0327SQ	\$30,904.50
21. March 28, 2016	16JHS0328NM	\$20,201.00
22. March 29, 2016	16JHS0329MS	\$15,999.00

Maria

-----Original Message-----

From: Verdecia, Ernest [<mailto:Ernest.Verdecia@jhsnmiami.org>]
Sent: Tuesday, April 05, 2016 2:16 PM
To: Inger Lisa Skroder - Trinity Air Ambulance
Cc: Maria P
Subject: RE: JHS invoices

Hi Maria and Lisa,

Please send me all invoices you have pending of patients you have brought into any Jackson facility in the past 60 days

Thanks

Ernie

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance [<mailto:IngerLisa@TrinityAirAmbulance.com>]

Sent: Saturday, April 02, 2016 11:43 AM

To: Verdecia, Ernest

Cc: Maria P

Subject: JHS invoices

Hi Ernie

Nice speaking with you today.

On another note, can you find out what the status is of our invoices as we have not received payment for some time.

Can we have a conference call on Thursday, April 7th to discuss the status or if you could email Maria the list - thanks !

Have a nice weekend

Inger-Lisa Skroder, MN, ARNP

Trinity Air Ambulance International

Office: 954-771-7911

Mobile: 305-205-0570

From: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Sent: Monday, April 11, 2016 6:10 PM
To: Alvarez, Fidel
Subject: Re: RE:

Nothing more came through

Sent from my iPhone

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Exec vp link to approve the req please 997580

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From: Ernest.Verdecia@jhsmiami.org
Sent: Monday, April 11, 2016 6:32 PM
To: RCostanz@jhsmiami.org; FAlvarez@jhsmiami.org
Cc: luis.fernandez@jhsmiami.org
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Rosa

These are international patients that trinity brought into our facilities I can't approve invoices that pertain to - International When I forwarded these to Elvia from that department she said they should bill insurance

I have no way of reconciling since Its not my patient that I approved for transport

Ernie

----- Original Message -----

From: Costanzo, Rosa M
Sent: Monday, April 11, 2016 04:21 PM
To: Verdecia, Ernest; Alvarez, Fidel
Cc: Fernandez, Luis
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Ernie-

Who is responsible for the approval of these invoices? Is there funding available on the existing PO for these invoices? Do you know if they have been approved for payment?

Thank you

Rosa M. Costanzo, CMRP, CPPB, CPSM
VP/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096
Telephone: (305) 585-7333
Facsimile: (305) 585-1412
RCostanz@jhsmiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

-----Original Message-----

From: Verdecia, Ernest
Sent: Monday, April 11, 2016 10:53 AM
To: Trinity Air Ambulance - Maria
Cc: Costanzo, Rosa M; Fernandez, Luis
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Maria,

We would like to have a meeting at your facility to discuss process and procedure to expedite your invoices. Luis Fernandez and myself would be available this Thursday to go up and visit your site at around 1030am. Please let me know if this is good with you and if not give me some date and times that work.

Thanks

Ernie

-----Original Message-----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Friday, April 08, 2016 3:00 PM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; maria@trinityairambulance.com
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

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15. March 11, 2016	[REDACTED] 16JHS0311JB	\$8,673.38
16. March 14, 2016	[REDACTED] 16JHS0314VP	\$17,159.10
17. March 17, 2016	[REDACTED] 16JHS0317PA	\$10,675.00
18. March 17, 2016	[REDACTED] 16JHS0317AA	\$17,632.00
19. March 27, 2016	[REDACTED] 16JHS0327FV	\$6,742.80
20. March 27, 2016	[REDACTED] 16JHS0327SQ	\$30,904.50
21. March 28, 2016	[REDACTED] 16JHS0328NM	\$20,201.00
22. March 29, 2016	[REDACTED] 16JHS0329MS	\$15,999.00

Maria

-----Original Message-----

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Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

From: Inger Lisa Skroder - Trinity Air Ambulance International
<IngerLisa@TrinityAirAmbulance.com>
Sent: Monday, April 11, 2016 7:31 PM
To: Costanzo, Rosa M
Subject: FW: [REDACTED] - Invoice 16JHS0122WM from Trinity Air Ambulance International, LLC

Rosa
All cases have been "Financially" and "Medically" cleared thru Jackson International.
Here is an example.
Inger Lisa

-----Original Message-----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Tuesday, February 23, 2016 1:03 PM
To: 'Verdecia, Ernest'
Cc: 'Contreras, Alejandro E'; maria@trinityairambulance.com
Subject: RE: [REDACTED] - Invoice 16JHS0122WM from Trinity Air Ambulance International, LLC

Good Morning Ernie,

This is another case that we arranged thru Jackson International. Patient was financially cleared by Miguel Del Toro, International Coordinator, International Department, Jackson Memorial Hospital.

Further to Inger Lisa's meeting with Mr. Contreras, we are following the directive of potential patients needing admission are to be "Financially Cleared" by Jackson International. Once the patient is "financially cleared" we transport to Jackson Memorial in Miami or Jackson North in North Miami depending on the patient's medical needs and bed space.

Maria

-----Original Message-----

From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhs-miami.org]
Sent: Tuesday, February 23, 2016 1:00 PM
To: Trinity Air Ambulance - Maria
Cc: Contreras, Alejandro E
Subject: RE: [REDACTED] - Invoice 16JHS0122WM from Trinity Air Ambulance International, LLC

Hi Maria

I need a little more info on this one who arranged this call?

Ernie

-----Original Message-----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Tuesday, February 23, 2016 12:06 PM
To: ghxodap.jacksonhealthsystems@na.firstsource.com
Cc: Verdecia, Ernest; Contreras, Alejandro E; maria@trinityairambulance.com
Subject: JHS: [REDACTED] - Invoice 16JHS0122WM from Trinity Air Ambulance International, LLC

Good Afternoon,

Please find attached our invoice for patent [REDACTED] that we brought to Jackson yesterday February 22nd, 2016.

Please confirm receipt.

Kind Regards,

Maria Pejdanovska
Trinity Air Ambulance International, LLC
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308

Ph: 954-771-7911
Fax: 954-771-4882

Email: Maria@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

This transmission and any information attached to it may be confidential and is intended solely for the use of the individual or entity to which it is addressed. If you are not the intended recipient, please notify the sender immediately by calling (954) 771-7911. If you are not the intended recipient or the person responsible for delivering the transmission to the intended recipient, you are advised that any use, dissemination, forwarding, printing, or copying of this information is strictly prohibited.

From: Inger Lisa Skroder - Trinity Air Ambulance International
To: "Contreras, Alejandro E"
Cc: "Costanzo, Rosa M"; "Maria P"
Subject: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance
Date: Monday, April 11, 2016 7:56:55 PM
Attachments: JHS - Transport Procedure for Incoming Outgoing Patients for Jackson.msg

Good Evening Alejandro & Rosa

RE: Contract (RFP) 13-11355-CS

On Friday, February 12, 2016, we had a meeting and our Contract (RFP) 13-11355-CS - Air Ambulance Transportation was discussed.

On Thursday, February 18th, 2016, I sent an email to Alex & Maria (Trinity's office manager) advising Maria of what was discussed and agreed upon at our February 12th meeting. I provided her with the Transport Procedure for Incoming & Outgoing Patients for Jackson (see attached). The next day, Trinity commenced transportation using our Contract and Rates. The procedure as follows:

1. Incoming patients, Trinity will obtain "Financial Clearance" & Acceptance from the Jackson International or Jackson Domestic Department, and then Trinity will transport and then bill Jackson
2. Outgoing patients, Trinity will confirm health insurance coverage (for Subrogation purposes) and then Trinity will transport and then bill Jackson

Since February 18th, a total of 20 new patients have been brought to Jackson. Most if not all, have been of high acuity, requiring ICU stays. These patients could have been accepted at other facilities.

On each and every case, Trinity obtained from the International Department (and I believe one from the Domestic Department) Financial & Medical Clearances (we have copies of emails from the International Department these "clearances" for each transfer). For cases that could not be financially cleared, we have had to transport to other facilities. Maria then sent invoices, per the Contracted rates, to Ernie, who acknowledged each one. He has requested confirmation of with whom at the Jackson International Department who provided the clearance - and we provided that information to him. He then replied to Maria that he had "approved" the invoice, for each one.

The process appeared to be flowing well so I am not sure what the hold-up is on the payments for the invoices. Can you let us know when we should expect payment. We would like to continue to refer patients to Jackson, since JHS can handle all cases & the outcomes have been positive.

In addition, I have spoken with Rosa with regards to other clients that I believe collaboratively we could approach and present Jackson as the primary care provider. Let me know when you both can meet to further discuss.

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882

Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

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-----Original Message-----

From: Contreras, Alejandro E [<mailto:Alejandro.Contreras@jhsmiami.org>]
Sent: Friday, April 08, 2016 5:19 PM
To: Verdecia, Ernest; 'maria@trinityairambulance.com'; Corrales, Diamela
Cc: Costanzo, Rosa M; 'ingerlisa@trinityairambulance.com'
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Ernie/Diamela- We need check if patients had insurance and provide this information. If insurance does not pay we need to. Insurance info must be provided so they can bill if they can get pay

-----Original Message-----

From: Verdecia, Ernest
Sent: Friday, April 8, 2016 4:35 PM
To: 'maria@trinityairambulance.com' <maria@trinityairambulance.com>; Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'ingerlisa@trinityairambulance.com' <ingerlisa@trinityairambulance.com>
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Maria

Yes I understand but these are international patients, after I checked with international they advised when a patient is brought into our facility you are to bill patients insurance

Since this is not my normal scope of service I turfed them to international for final approval and that's what was advised yes I gave the initial approval but its up to them for final approval since its their patient

Sorry for the confusion please call me Monday to discuss

Ernie

----- Original Message -----

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Friday, April 08, 2016 04:12 PM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance' <ingerlisa@trinityairambulance.com>
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Thanks for your reply Ernie

I am a little confused. We were advised by Mr. Alejandro Contreras to send invoices to you and you were to send for processing. And when I emailed you the invoices (and 99% are International), you have reviewed them and replied, for example:

1. For date of service January 28, 2016, patient [REDACTED] you wrote back "Approved!! We will process through our system asap" (see attached email "RE: [REDACTED] - Invoice....").
2. For date of service February 19, 2016, patient [REDACTED] you wrote back " Approved ! Please process asap ! Thanks" (see attached email "RE: [REDACTED] - Invoice...") and you included ghxodap.jacksonhealthsystems@na.firstsource.com)
3. For date of service March 17, 2016, patient [REDACTED] you wrote back "received thanks" (see attached email "RE: [REDACTED] ..").

Thank you in advance for the clarification of the process. We wish not to have any further delays.

Please provide an update on each of the 22 outstanding invoices as to the status of payment.

Maria

-----Original Message-----

From: Verdecia, Ernest [<mailto:Ernest.Verdecia@jhsmiami.org>]
Sent: Friday, April 08, 2016 4:00 PM
To: 'maria@trinityairambulance.com'
Cc: Costanzo, Rosa M
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Maria,

I've received your invoices, however most of the patients are incoming international patients. I've forwarded these invoices to Elvia from our

International department for review.

I am available Monday morning to discuss further and may possibly have an update from Elvia, please feel free to call me then.

Thanks
Emie

----- Original Message -----

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Friday, April 08, 2016 03:00 PM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; maria@trinityairambulance.com
<maria@trinityairambulance.com>
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Emie

I am following up to ensure you received my email with regards to the 22 invoices.

Can you let me know what the status is on each ?

Maria

-----Original Message-----

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Thursday, April 07, 2016 11:59 AM
To: 'Verdecia, Ernest'
Cc: Costanzo, Rosa M; maria@trinityairambulance.com
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Emie

Thank you for your email. As requested please find the list of twenty two (22) invoices. I have included the following: date of service, patient name, invoice number and amount due.

Please advise payment status for each.

1. October 17, 2015	[REDACTED]	15JHS1017YB	\$19,920.00
2. January 28, 2016	[REDACTED]	16JHS0128KS	\$10,000.00
3. February 19, 2016	[REDACTED]	16JHS0219BH	\$17,254.88
4. February 22, 2016	[REDACTED]	16JHS0222WM	\$15,134.40
5. February 23, 2016	[REDACTED]	16JHS0223MZ	\$15,134.40
6. February 27, 2016	[REDACTED]	16JHS0226GB	\$10,089.00
7. February 28, 2016	[REDACTED]	16JHS0228LS	\$7,185.20
8. March 4, 2016	[REDACTED]	16JHS0303AR	\$25,055.00
9. March 7, 2016	[REDACTED]	16JHS0307GD	\$17,272.50
10. March 8, 2016	[REDACTED]	16JHS0308DG	\$16,922.50
11. March 8, 2016	[REDACTED]	16JHS0308SS	\$16,922.50
12. March 10, 2016	[REDACTED]	16JHS0310CK	\$16,772.60
13. March 11, 2016	[REDACTED]	16JHS0311KC	\$8,740.50
14. March 11, 2016	[REDACTED]	16JHS0311DB	\$15,682.10
15. March 11, 2016	[REDACTED]	16JHS0311JB	\$8,673.38
16. March 14, 2016	[REDACTED]	16JHS0314VP	\$17,159.10

17. March 17, 2016	[REDACTED]	16JHS0317PA	\$10,675.00
18. March 17, 2016	[REDACTED]	16JHS0317AA	\$17,632.00
19. March 27, 2016	[REDACTED]	16JHS0327FV	\$6,742.80
20. March 27, 2016	[REDACTED]	16JHS0327SQ	\$30,904.50
21. March 28, 2016	[REDACTED]	16JHS0328NM	\$20,201.00
22. March 29, 2016	[REDACTED]	16JHS0329MS	\$15,999.00

Maria

-----Original Message-----

From: Verdecia, Ernest [<mailto:Ernest.Verdecia@jhsmiami.org>]
 Sent: Tuesday, April 05, 2016 2:16 PM
 To: Inger Lisa Skroder - Trinity Air Ambulance
 Cc: Maria P
 Subject: RE: JHS invoices

Hi Maria and Lisa,

Please send me all invoices you have pending of patients you have brought into any Jackson facility in the past 60 days

Thanks

Ernie

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance
[\[mailto:IngerLisa@TrinityAirAmbulance.com\]](mailto:IngerLisa@TrinityAirAmbulance.com)
 Sent: Saturday, April 02, 2016 11:43 AM
 To: Verdecia, Ernest
 Cc: Maria P
 Subject: JHS invoices

Hi Ernie

Nice speaking with you today.

On another note, can you find out what the status is of our invoices as we have not received payment for some time.

Can we have a conference call on Thursday, April 7th to discuss the status or if you could email Maria the list - thanks !

Have a nice weekend

Inger-Lisa Skroder, MN, ARNP
 Trinity Air Ambulance International
 Office: 954-771-7911
 Mobile: 305-205-0570

From: CFernandez@jhsmiami.org
Sent: Monday, April 11, 2016 3:58 PM
To: Antonio.Cabrera1@jhsmiami.org
Cc: Laura.Scott@jhsmiami.org; VQuintero@jhsmiami.org; FAlvarez@jhsmiami.org; cedrina.murphyrusse@jhsmiami.org
Subject: RE: Trinity Air Transportation ***URGENT***

Tony- Please pay all invoices released for payment this afternoon.
Thanks

From: Quintero, Victoria
Sent: Monday, April 11, 2016 2:19 PM
To: Alvarez, Fidel; Murphy russell, Cedrina
Cc: Fernandez, Carmen L.; Scott, Laura J
Subject: FW: Trinity Air Transportation ***URGENT***
Importance: High

Fidel – Can you provide a list of invoices that will make up this amount and are they covered by a PO? I've cc'd Cedrina as she handles this vendor.

From: Alvarez, Fidel
Sent: Monday, April 11, 2016 11:52 AM
To: Fernandez, Carmen L.; Quintero, Victoria; Scott, Laura J
Subject: Trinity Air Transportation

Team ,I am giving you guys a heads up we will need to make payment for this vendor today in the amount of 173,000.00 . I am trying to get all the emergency forms signed and invoices approved so that it can be processed . but we will need a check cut today , Sorry don't kill the messenger .
This vendor is threatening to stop their services and this is for transplant we won't be able to pick up organs .

Fidel Alvarez, C.R.C.S.T., CPPB
Procurement Manager
Procurement Management

Jackson Memorial Hospital
1500 N.W 12th Avenue
Miami, FL 33136-1096
Phone: 305-585-7058
Fax: 305-355-2303
falvarez@jhsmiami.org

Supplier Portal

Jackson Health System is now using an electronic procurement solicitation system. Please access our Supplier Portal using the following link to review and respond to solicitations.

Please note that you will be able to view open solicitations by clicking on the BROWSE OPEN EVENTS link. In order to respond

electronically to a solicitation, you will need to create a no fee account. You can create an account by clicking the following link:
<http://www.jacksonhealth.org/vendors-supplier-portal.asp>

Please know that this does not take the place of the Public Health Trust's Vendor Registration which is required for the award of all contracts. The vendor registration application can be found on the JHS website via the following link: [Vendor Registration](#)

Jackson Health System is part of the Reptrax vendor credentialing community. All vendors who wish to gain access to our facilities are required to register by visiting www.Reptrax.com

From: Andrew.Figueroa@jhsmiami.org
Sent: Monday, April 11, 2016 12:23 PM
To: melissa.constanzo@jhsmiami.org; KWu@jhsmiami.org; FAlvarez@jhsmiami.org;
Jennifer.Rodriguez@jhsmiami.org; gila.kimmelman@jhsmiami.org
Cc: damaris.cabarcas@jhsmiami.org
Subject: RE: Trinity Air
Attachments: 20160411120636922.tif

Signed invoices attached.

Jennifer – where is the REQ now?

Gila – we're trying to get Trinity paid before they threaten to cut services. We're using the Emergency Procurement process per Rosa's suggestion to get them paid before the Board approves the PO increase. We could really use your help in getting this REQ # 997580 approved post haste

From: Constanzo, Melissa
Sent: Monday, April 11, 2016 11:00 AM
To: Figueroa, Andrew J <Andrew.Figueroa@jhsmiami.org>; Wu, Kwok-fai <KWu@jhsmiami.org>; Alvarez, Fidel <FAlvarez@jhsmiami.org>
Cc: Cabarcas, Damaris (121761) <damaris.cabarcas@jhsmiami.org>
Subject: RE: Trinity Air

Ok done!
Req#997580

Melissa Constanzo
Office Manager, Transplant
Miami Transplant Institute
1801 N.W. 9th Ave, #302
Miami, FL 33136
(305)355-5347
www.MiamiTransplant.org

From: Figueroa, Andrew J
Sent: Monday, April 11, 2016 10:55 AM
To: Wu, Kwok-fai <KWu@jhsmiami.org>; Constanzo, Melissa <melissa.constanzo@jhsmiami.org>; Alvarez, Fidel <FAlvarez@jhsmiami.org>
Cc: Cabarcas, Damaris (121761) <damaris.cabarcas@jhsmiami.org>
Subject: RE: Trinity Air

Acct 630950

75007	\$	75,877.12
75008	\$	29,631.74
75012	\$	48,135.12
75006	\$	3,414.85
75009	\$	3,414.86
75010	\$	3,414.86
		<u>\$163,888.55</u>

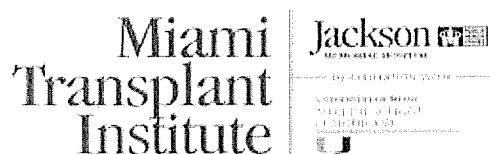
From: Wu, Kwok-fai
Sent: Monday, April 11, 2016 9:48 AM
To: Figueroa, Andrew J <Andrew.Figueroa@jhsmiami.org>; Constanzo, Melissa <melissa.constanzo@jhsmiami.org>; Alvarez, Fidel <FAlvarez@jhsmiami.org>
Cc: Cabarcas, Damaris (121761) <damaris.cabarcas@jhsmiami.org>
Subject: RE: Trinity Air

Fidel,

Attached are copies of 11 invoices of Trinity Air. Let me know if you need additional information.

Thank you,

Steve Wu
 Transplant Accountant
 Jackson Transplant Center
 Jackson Memorial Hospital
 1801 NW 9th Avenue, 5th floor
 Miami, FL 33136
 Phone: 305- 355-5714
 Fax: 305-355-2991
kwu@jhsmiami.org



From: Figueroa, Andrew J
Sent: Friday, April 08, 2016 5:54 PM
To: Constanzo, Melissa; Alvarez, Fidel; Wu, Kwok-fai
Cc: Cabarcas, Damaris (121761)
Subject: RE: Trinity Air

Steve- I need you to send all copied copies of the 11 invoices

Fidel- I'm pretty sure these all exist on Image Express too

Sent with Good (www.good.com)

-----Original Message-----

From: Constanzo, Melissa
Sent: Friday, April 08, 2016 05:49 PM Eastern Standard Time
To: Alvarez, Fidel
Cc: Figueroa, Andrew J
Subject: RE: Trinity Air

Fidel I'm sorry I am out of the office today and Monday
Andrew can you forward him the invoices I can't log on from where I am right now

Sent with Good (www.good.com)

-----Original Message-----

From: Alvarez, Fidel
Sent: Friday, April 08, 2016 04:23 PM Eastern Standard Time
To: Constanzo, Melissa
Subject: Trinity Air

Sorry can you also send me copies of the 11 invoices ? please thanks

Fidel Alvarez, C.R.C.S.T., CPPB
Procurement Manager
Procurement Management

Jackson Memorial Hospital
1500 N.W 12th Avenue
Miami, FL 33136-1096
Phone: 305-585-7058
Fax: 305-355-2303
falvarez@jhsmiami.org

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www.Reptrax.com

From: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Sent: Tuesday, April 12, 2016 3:49 PM
To: 'Inger Lisa Skroder - Trinity Air Ambulance International'; Pacheco, Jannette
Cc: Costanzo, Rosa M; 'Maria P'
Subject: RE: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

I want to make sure that we are on the same page. I expect that Trinity will bill insurance for patients. If insurance does not cover and we approved they can bill us. We are not a provider and we do not bill

Jannette- Please schedule urgent call for tomorrow

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International [mailto:IngerLisa@TrinityAirAmbulance.com]
Sent: Monday, April 11, 2016 7:49 PM
To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'Maria P' <Maria@TrinityAirAmbulance.com>
Subject: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

Good Evening Alejandro & Rosa

RE: Contract (RFP) 13-11355-CS

On Friday, February 12, 2016, we had a meeting and our Contract (RFP) 13-11355-CS - Air Ambulance Transportation was discussed.

On Thursday, February 18th, 2016, I sent an email to Alex & Maria (Trinity's office manager) advising Maria of what was discussed and agreed upon at our February 12th meeting. I provided her with the Transport Procedure for Incoming & Outgoing Patients for Jackson (see attached). The next day, Trinity commenced transportation using our Contract and Rates. The procedure as follows:

1. Incoming patients, Trinity will obtain "Financial Clearance" & Acceptance from the Jackson International or Jackson Domestic Department, and then Trinity will transport and then bill Jackson
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These patients could have been accepted at other facilities.

On each and every case, Trinity obtained from the International Department (and I believe one from the Domestic Department) Financial & Medical Clearances (we have copies of emails from the International Department these "clearances" for each transfer). For cases that could not be financially cleared, we have had to transport to other facilities. Maria then sent invoices, per the Contracted rates, to Ernie, who acknowledged each one. He has requested confirmation of with whom at the Jackson International Department who provided the clearance - and we provided that information to him. He then replied to Maria that he had "approved" the invoice, for each one.

The process appeared to be flowing well so I am not sure what the hold-up is on the payments for the invoices. Can you let us know when we should expect payment. We would like to continue to refer patients to Jackson, since JHS can handle all cases & the outcomes have been positive.

In addition, I have spoken with Rosa with regards to other clients that I believe collaboratively we could approach and present Jackson as the primary care provider. Let me know when you both can meet to further discuss.

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882

Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

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From: Contreras, Alejandro E [mailto:Alejandro.Contreras@jhsmiami.org]
Sent: Friday, April 08, 2016 5:19 PM
To: Verdecia, Ernest; 'maria@trinityairambulance.com'; Corrales, Diamela
Cc: Costanzo, Rosa M; 'ingerlisa@trinityairambulance.com'
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Ernie/Diamela- We need check if patients had insurance and provide this information. If insurance does not pay we need to. Insurance info must be provided so they can bill if they can get pay

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Sent: Friday, April 8, 2016 4:35 PM
To: 'maria@trinityairambulance.com' <maria@trinityairambulance.com>; Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'ingerlisa@trinityairambulance.com' <ingerlisa@trinityairambulance.com>
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Maria

Yes I understand but these are international patients, after I checked with international they advised when a patient is brought into our facility you are to bill patients insurance

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Sorry for the confusion please call me Monday to discuss

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Sent: Friday, April 08, 2016 04:12 PM

To: Verdecia, Ernest

Cc: Costanzo, Rosa M; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance'

<ingerlisa@trinityairambulance.com>

Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

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2. For date of service February 19, 2016, patient [REDACTED] you wrote back " Approved ! Please process asap ! Thanks" (see attached email "RE: [REDACTED] - Invoice...") and you included ghxodap.jacksonhealthsystems@na.firstsouce.com)

3. For date of service March 17, 2016, patient [REDACTED] you wrote back "received thanks" (see attached email "RE: [REDACTED] ..").

Thank you in advance for the clarification of the process. We wish not to have any further delays.

Please provide an update on each of the 22 outstanding invoices as to the status of payment.

Maria

-----Original Message-----

From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhsmiami.org]

Sent: Friday, April 08, 2016 4:00 PM

To: 'maria@trinityairambulance.com'

Cc: Costanzo, Rosa M

Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Maria,

I've received your invoices, however most of the patients are incoming international patients. I've forwarded these invoices to Elvia from our International department for review.

I am available Monday morning to discuss further and may possibly have an update from Elvia, please feel free to call me then.

Thanks
Ernie

----- Original Message -----

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Cc: Costanzo, Rosa M; maria@trinityairambulance.com <maria@trinityairambulance.com>
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

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-----Original Message-----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Thursday, April 07, 2016 11:59 AM
To: 'Verdecia, Ernest'
Cc: Costanzo, Rosa M; maria@trinityairambulance.com
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

Thank you for your email. As requested please find the list of twenty two (22) invoices. I have included the following: date of service, patient name, invoice number and amount due.

Please advise payment status for each.

1. October 17, 2015	[REDACTED]	15JHS1017YB	\$19,920.00	
2. January 28, 2016	[REDACTED]	16JHS0128KS	\$10,000.00	
3. February 19, 2016	[REDACTED]	16JHS0219BH	\$17,254.88	
4. February 22, 2016	[REDACTED]	16JHS0222WM	\$15,134.40	
5. February 23, 2016	[REDACTED]	16JHS0223MZ		\$15,134.40
6. February 27, 2016	[REDACTED]	16JHS0226GB	\$10,089.00	
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8. March 4, 2016	[REDACTED]	16JHS0303AR	\$25,055.00	
9. March 7, 2016	[REDACTED]	16JHS0307GD	\$17,272.50	
10. March 8, 2018	[REDACTED]	16JHS0308DG	\$16,922.50	
11. March 8, 2016	[REDACTED]	16JHS0308SS	\$16,922.50	

12. March 10, 2016	[REDACTED]	16JHS0310CK	\$16,772.60
13. March 11, 2016	[REDACTED]	16JHS0311KC	\$8,740.50
14. March 11, 2016	[REDACTED]	16JHS0311DB	\$15,682.10
15. March 11, 2016	[REDACTED]	16JHS0311JB	\$8,673.38
16. March 14, 2016	[REDACTED]	16JHS0314VP	\$17,159.10
17. March 17, 2016	[REDACTED]	16JHS0317PA	\$10,675.00
18. March 17, 2016	[REDACTED]	16JHS0317AA	\$17,632.00
19. March 27, 2016	[REDACTED]	16JHS0327FV	\$6,742.80
20. March 27, 2016	[REDACTED]	16JHS0327SQ	\$30,904.50
21. March 28, 2016	[REDACTED]	16JHS0328NM	\$20,201.00
22. March 29, 2016	[REDACTED]	16JHS0329MS	\$15,999.00

Maria

-----Original Message-----

From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhsmiami.org]
 Sent: Tuesday, April 05, 2016 2:16 PM
 To: Inger Lisa Skroder - Trinity Air Ambulance
 Cc: Maria P
 Subject: RE: JHS invoices

Hi Maria and Lisa,

Please send me all invoices you have pending of patients you have brought into any Jackson facility in the past 60 days

Thanks

Ernie

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance [mailto:IngerLisa@TrinityAirAmbulance.com]
 Sent: Saturday, April 02, 2016 11:43 AM
 To: Verdecia, Ernest
 Cc: Maria P
 Subject: JHS invoices

Hi Ernie

Nice speaking with you today.

On another note, can you find out what the status is of our invoices as we have not received payment for some time.

Can we have a conference call on Thursday, April 7th to discuss the status or if you could email Maria the list - thanks !

Have a nice weekend

Inger-Lisa Skroder, MN, ARNP
 Trinity Air Ambulance International

Office: 954-771-7911
Mobile: 305-205-0570

From: Alejandro.Contreras@jhsmiami.org
Sent: Tuesday, April 12, 2016 3:50 PM
To: Ernest.Verdecia@jhsmiami.org; Diamela.Corrales@jhsmiami.org;
luis.fernandez@jhsmiami.org
Subject: FW: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

-----Original Message-----

From: Contreras, Alejandro E
Sent: Tuesday, April 12, 2016 3:49 PM
To: 'Inger Lisa Skroder - Trinity Air Ambulance International' <IngerLisa@TrinityAirAmbulance.com>; Pacheco, Jannette <jannette.pacheco@jhsmiami.org>
Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'Maria P' <Maria@TrinityAirAmbulance.com>
Subject: RE: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

I want to make sure that we are on the same page. I expect that Trinity will bill insurance for patients. If insurance does not cover and we approved they can bill us. We are not a provider and we do not bill

Jannette- Please schedule urgent call for tomorrow

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International [mailto:IngerLisa@TrinityAirAmbulance.com]
Sent: Monday, April 11, 2016 7:49 PM
To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'Maria P' <Maria@TrinityAirAmbulance.com>
Subject: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

Good Evening Alejandro & Rosa

RE: Contract (RFP) 13-11355-CS

On Friday, February 12, 2016, we had a meeting and our Contract (RFP) 13-11355-CS - Air Ambulance Transportation was discussed.

On Thursday, February 18th, 2016, I sent an email to Alex & Maria (Trinity's office manager) advising Maria of what was discussed and agreed upon at our February 12th meeting. I provided her with the Transport Procedure for Incoming & Outgoing Patients for Jackson (see attached). The next day, Trinity commenced transportation using our Contract and Rates. The procedure as follows:

1. Incoming patients, Trinity will obtain "Financial Clearance" & Acceptance from the Jackson International or Jackson Domestic Department, and then Trinity will transport and then bill Jackson
2. Outgoing patients, Trinity will confirm health insurance coverage (for Subrogation purposes) and then Trinity will transport and then bill Jackson

Since February 18th, a total of 20 new patients have been brought to Jackson. Most if not all, have been of high acuity, requiring ICU stays.

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luis.fernandez@jhsmiami.org
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To: 'Inger Lisa Skroder - Trinity Air Ambulance International' <IngerLisa@TrinityAirAmbulance.com>; Pacheco, Jannette <jannette.pacheco@jhsmiami.org>
Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'Maria P' <Maria@TrinityAirAmbulance.com>
Subject: RE: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

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Jannette- Please schedule urgent call for tomorrow

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From: Inger Lisa Skroder - Trinity Air Ambulance International [mailto:IngerLisa@TrinityAirAmbulance.com]
Sent: Monday, April 11, 2016 7:49 PM
To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'Maria P' <Maria@TrinityAirAmbulance.com>
Subject: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

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These patients could have been accepted at other facilities.

On each and every case, Trinity obtained from the International Department (and I believe one from the Domestic Department) Financial & Medical Clearances (we have copies of emails from the International Department these "clearances" for each transfer). For cases that could not be financially cleared, we have had to transport to other facilities. Maria then sent invoices, per the Contracted rates, to Ernie, who acknowledged each one. He has requested confirmation of with whom at the Jackson International Department who provided the clearance - and we provided that information to him. He then replied to Maria that he had "approved" the invoice, for each one.

The process appeared to be flowing well so I am not sure what the hold-up is on the payments for the invoices. Can you let us know when we should expect payment. We would like to continue to refer patients to Jackson, since JHS can handle all cases & the outcomes have been positive.

In addition, I have spoken with Rosa with regards to other clients that I believe collaboratively we could approach and present Jackson as the primary care provider. Let me know when you both can meet to further discuss.

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882

Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

This transmission and any information attached to it may be confidential and is intended solely for the use of the individual or entity to which it is addressed. If you are not the intended recipient, please notify the sender immediately by calling (954) 771-7911. If you are not the intended recipient or the person responsible for delivering the transmission to the intended recipient, you are advised that any use, dissemination, forwarding, printing, or copying of this information is strictly prohibited.

-----Original Message-----

From: Contreras, Alejandro E [mailto:Alejandro.Contreras@jhsmiami.org]
Sent: Friday, April 08, 2016 5:19 PM
To: Verdecia, Ernest; 'maria@trinityairambulance.com'; Corrales, Diamela
Cc: Costanzo, Rosa M; 'ingerlisa@trinityairambulance.com'
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Ernie/Diamela- We need check if patients had insurance and provide this information. If insurance does not pay we need to. Insurance info must be provided so they can bill if they can get pay

-----Original Message-----

From: Verdecia, Ernest

Sent: Friday, April 8, 2016 4:35 PM

To: 'maria@trinityairambulance.com' <maria@trinityairambulance.com>; Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>

Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'ingerlisa@trinityairambulance.com' <ingerlisa@trinityairambulance.com>

Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Maria

Yes I understand but these are international patients, after I checked with international they advised when a patient is brought into our facility you are to bill patients insurance

Since this is not my normal scope of service I turfed them to international for final approval and that's what was advised yes I gave the initial approval but its up to them for final approval since its their patient

Sorry for the confusion please call me Monday to discuss

Ernie

----- Original Message -----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]

Sent: Friday, April 08, 2016 04:12 PM

To: Verdecia, Ernest

Cc: Costanzo, Rosa M; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance' <ingerlisa@trinityairambulance.com>

Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Thanks for your reply Ernie

I am a little confused. We were advised by Mr. Alejandro Contreras to send invoices to you and you were to send for processing. And when I emailed you the invoices (and 99% are International), you have reviewed them and replied, for example:

1. For date of service January 28, 2016, patient [REDACTED] you wrote back "Approved!! We will process through our system asap" (see attached email "RE: [REDACTED] - Invoice....").
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3. For date of service March 17, 2016, patient [REDACTED] you wrote back "received thanks" (see attached email "RE: [REDACTED] ..").

Thank you in advance for the clarification of the process. We wish not to have any further delays.

Please provide an update on each of the 22 outstanding invoices as to the status of payment.

Maria

-----Original Message-----

From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhsmiami.org]
Sent: Friday, April 08, 2016 4:00 PM
To: 'maria@trinityairambulance.com'
Cc: Costanzo, Rosa M
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Maria,

I've received your invoices, however most of the patients are incoming international patients. I've forwarded these invoices to Elvia from our International department for review.

I am available Monday morning to discuss further and may possibly have an update from Elvia, please feel free to call me then.

Thanks
Ernie

----- Original Message -----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Friday, April 08, 2016 03:00 PM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; maria@trinityairambulance.com <maria@trinityairambulance.com>
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

I am following up to ensure you received my email with regards to the 22 invoices.
Can you let me know what the status is on each ?

Maria

-----Original Message-----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Thursday, April 07, 2016 11:59 AM
To: 'Verdecia, Ernest'
Cc: Costanzo, Rosa M; maria@trinityairambulance.com
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Hi Ernie

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21. March 28, 2016	16JHS0328NM	\$20,201.00
22. March 29, 2016	16JHS0329MS	\$15,999.00

Maria

-----Original Message-----

From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhsmiami.org]

Sent: Tuesday, April 05, 2016 2:16 PM

To: Inger Lisa Skroder - Trinity Air Ambulance

Cc: Maria P

Subject: RE: JHS invoices

Hi Maria and Lisa,

Please send me all invoices you have pending of patients you have brought into any Jackson facility in the past 60 days

Thanks

Ernie

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance [mailto:IngerLisa@TrinityAirAmbulance.com]

Sent: Saturday, April 02, 2016 11:43 AM

To: Verdecia, Ernest

Cc: Maria P

Subject: JHS invoices

Hi Ernie

Nice speaking with you today.

On another note, can you find out what the status is of our invoices as we have not received payment for some time.

Can we have a conference call on Thursday, April 7th to discuss the status or if you could email Maria the list - thanks !

Have a nice weekend

Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

From: Antonio.Cabrera1@jhsmiami.org
Sent: Tuesday, April 12, 2016 4:32 PM
To: CFernandez@jhsmiami.org; FAlvarez@jhsmiami.org
Cc: Laura.Scott@jhsmiami.org; VQuintero@jhsmiami.org;
cedrina.murphyrusse@jhsmiami.org
Subject: RE: Trinity Air Transportation ***URGENT***

An additional payment of 438,820.59 has just been made. Paid with PMS payment# 2003131.

Thank you,

Antonio T. Cabrera

Jackson Health System
Treasury and Reimbursement

(P): 786-466-8053
(F): 305-355-2333
antonio.cabrera1@jhsmiami.org

From: Cabrera, Antonio T
Sent: Monday, April 11, 2016 5:10 PM
To: Fernandez, Carmen L.; Alvarez, Fidel
Cc: Scott, Laura J; Quintero, Victoria; Murphy russell, Cedrina
Subject: RE: Trinity Air Transportation ***URGENT***

Only 39,282.10 was available and coded to pay. Paid with PMS payment# 2003127.

Thanks,

Antonio T. Cabrera

Jackson Health System
Treasury and Reimbursement

(P): 786-466-8053
(F): 305-355-2333
antonio.cabrera1@jhsmiami.org

From: Cabrera, Antonio T
Sent: Monday, April 11, 2016 4:33 PM
To: Fernandez, Carmen L.
Cc: Scott, Laura J; Quintero, Victoria; Alvarez, Fidel; Murphy russell, Cedrina
Subject: RE: Trinity Air Transportation ***URGENT***

Fidel,

Are the issues resolved for A/P to process so I can pay?

From: Fernandez, Carmen L.
Sent: Monday, April 11, 2016 3:58 PM
To: Cabrera, Antonio T
Cc: Scott, Laura J; Quintero, Victoria; Alvarez, Fidel; Murphy russell, Cedrina
Subject: RE: Trinity Air Transportation ***URGENT***

Tony- Please pay all invoices released for payment this afternoon.
Thanks

From: Quintero, Victoria
Sent: Monday, April 11, 2016 2:19 PM
To: Alvarez, Fidel; Murphy russell, Cedrina
Cc: Fernandez, Carmen L.; Scott, Laura J
Subject: FW: Trinity Air Transportation ***URGENT***
Importance: High

Fidel – Can you provide a list of invoices that will make up this amount and are they covered by a PO? I've cc'd Cedrina as she handles this vendor.

From: Alvarez, Fidel
Sent: Monday, April 11, 2016 11:52 AM
To: Fernandez, Carmen L.; Quintero, Victoria; Scott, Laura J
Subject: Trinity Air Transportation

Team ,I am giving you guys a heads up we will need to make payment for this vendor today in the amount of 173,000.00 . I am trying to get all the emergency forms signed and invoices approved so that it can be processed . but we will need a check cut today , Sorry don't kill the messenger .
This vendor is threatening to stop their services and this is for transplant we won't be able to pick up organs .

Fidel Alvarez, C.R.C.S.T., CPPB
Procurement Manager
Procurement Management

Jackson Memorial Hospital
1500 N.W 12th Avenue
Miami, FL 33136-1096
Phone: 305-585-7058
Fax: 305-355-2303
falvarez@jhsmiami.org

Supplier Portal

Jackson Health System is now using an electronic procurement solicitation system. Please access our Supplier Portal using the following link to review and respond to solicitations:

Please note that you will be able to view open solicitations by clicking on the BROWSE OPEN EVENTS link. In order to respond electronically to a solicitation, you will need to create a no fee account. You can create an account by clicking the following link:
<http://www.jacksonhealth.org/vendors-supplier-portal.asp>

Please know that this does not take the place of the Public Health Trust's Vendor Registration which is required for the award of all contracts. The vendor registration application can be found on the JHS website via the following link: [Vendor Registration](#)

Jackson Health System is part of the Reprax vendor credentialing community. All vendors who wish to gain access to our facilities are required to register by visiting www.Reprax.com

From: Costanzo, Rosa M <RCostanz@jhsmiami.org>
Sent: Tuesday, April 12, 2016 8:21 AM
To: Verdecia, Ernest; Fernandez, Luis
Cc: Contreras, Alejandro E
Subject: FW: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance
Attachments: JHS - Transport Procedure for Incoming & Outgoing Patients for Jackson

FYI- this should help with payment review and approvals.

Thank you
Rosa

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International [IngerLisa@TrinityAirAmbulance.com]
Sent: Monday, April 11, 2016 07:56 PM Eastern Standard Time
To: Contreras, Alejandro E
Cc: Costanzo, Rosa M; 'Maria P'
Subject: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

Good Evening Alejandro & Rosa

RE: Contract (RFP) 13-11355-CS

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Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
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Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882

Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

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Cc: Costanzo, Rosa M; 'ingerlisa@trinityairambulance.com'
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Ernie/Diamela- We need check if patients had insurance and provide this information. If insurance does not pay we need to. Insurance info must be

provided so they can bill if they can get pay

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Sent: Friday, April 8, 2016 4:35 PM
To: 'maria@trinityairambulance.com' <maria@trinityairambulance.com>;
Contreras, Alejandro E <Alejandro.Contreras@jhsiami.org>
Cc: Costanzo, Rosa M <RCostanz@jhsiami.org>;
'ingerlisa@trinityairambulance.com' <ingerlisa@trinityairambulance.com>
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Maria

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Sorry for the confusion please call me Monday to discuss

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From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Friday, April 08, 2016 04:12 PM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance' <ingerlisa@trinityairambulance.com>
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3. For date of service March 17, 2016, patient [REDACTED] you wrote back "received thanks" (see attached email "RE: [REDACTED] urg ..").

Thank you in advance for the clarification of the process. We wish not to have any further delays.

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-----Original Message-----

From: Verdecia, Ernest [<mailto:Ernest.Verdecia@jhsMiami.org>]
Sent: Friday, April 08, 2016 4:00 PM
To: 'maria@trinityairambulance.com'
Cc: Costanzo, Rosa M
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

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----- Original Message -----

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Friday, April 08, 2016 03:00 PM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; maria@trinityairambulance.com
<maria@trinityairambulance.com>
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

I am following up to ensure you received my email with regards to the 22 invoices.

Can you let me know what the status is on each ?

Maria

-----Original Message-----

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Thursday, April 07, 2016 11:59 AM
To: 'Verdecia, Ernest'
Cc: Costanzo, Rosa M; maria@trinityairambulance.com
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

Thank you for your email. As requested please find the list of twenty two (22) invoices. I have included the following: date of service, patient name, invoice number and amount due.

Please advise payment status for each.

1. October 17, 2015	[REDACTED]	15JHS1017YB	\$19,920.00
2. January 28, 2016	[REDACTED]	16JHS0128KS	\$10,000.00
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21. March 28, 2016	16JHS0328NM	\$20,201.00
22. March 29, 2016	16JHS0329MS	\$15,999.00

Maria

-----Original Message-----

From: Verdecia, Ernest [<mailto:Ernest.Verdecia@jhs-miami.org>]
 Sent: Tuesday, April 05, 2016 2:16 PM
 To: Inger Lisa Skroder - Trinity Air Ambulance
 Cc: Maria P
 Subject: RE: JHS invoices

Hi Maria and Lisa,

Please send me all invoices you have pending of patients you have brought into any Jackson facility in the past 60 days

Thanks

Ernie

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance
[\[mailto:IngerLisa@TrinityAirAmbulance.com\]](mailto:IngerLisa@TrinityAirAmbulance.com)
 Sent: Saturday, April 02, 2016 11:43 AM
 To: Verdecia, Ernest
 Cc: Maria P
 Subject: JHS invoices

Hi Ernie

Nice speaking with you today.

On another note, can you find out what the status is of our invoices as we have not received payment for some time.

Can we have a conference call on Thursday, April 7th to discuss the status or if you could email Maria the list - thanks !

Have a nice weekend

Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

From: Inger Lisa Skroder - Trinity Air Ambulance International
<IngerLisa@TrinityAirAmbulance.com>
Sent: Thursday, February 18, 2016 11:03 AM
To: 'Contreras, Alejandro E'
Cc: 'Maria P'
Subject: JHS - Transport Procedure for Incoming & Outgoing Patients for Jackson

Alex

Sorry to have interrupted your meeting. I am including Maria from my office in this email so she understands what we spoke about: the procedure for Incoming & Outgoing patients.

RE: JACKSON & TRINITY AIR AMBULANCE PROCEDURES

1. **Incoming patients**, Trinity will obtain "Financial Clearance" & Acceptance from the Jackson International or Jackson Domestic Department, and then Trinity will transport and then bill Jackson
2. **Outgoing patients**, Trinity will confirm health insurance coverage (for Subrogation purposes) and then Trinity will transport and then bill Jackson

JHS has a patient Mrs. RW who is in the MICU. She is ready for transfer to Virginia to the US Naval Hospital. Our aircraft and team have been on standby since last evening. The patient has Tricare coverage. It is taking a while to get authorization/approval in place from Tricare. Trinity will arrange and perform the transport from Jackson to the US Naval Hospital in Virginia – and then Trinity will bill and seek payment from Jackson. Trinity will subrogate the claim to the patient's primary coverage of Tricare.

So Maria, go ahead and activate our crew for the air ambulance.

***Alex- moving forward we will follow # 1 and # 2 procedures and just perform the missions – without having to bother you on each mission.

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882



Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com



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From: Ernest.Verdecia@jhsmiami.org
Sent: Tuesday, April 12, 2016 10:51 AM
To: luis.fernandez@jhsmiami.org
Subject: FW: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance
Attachments: JHS - Transport Procedure for Incoming & Outgoing Patients for Jackson

Your thoughts?? If Alex agreed I don't have a problem approving these invoices

Ernie

From: Costanzo, Rosa M
Sent: Tuesday, April 12, 2016 8:21 AM
To: Verdecia, Ernest; Fernandez, Luis
Cc: Contreras, Alejandro E
Subject: FW: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

FYI- this should help with payment review and approvals.

Thank you
Rosa

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International [IngerLisa@TrinityAirAmbulance.com]
Sent: Monday, April 11, 2016 07:56 PM Eastern Standard Time
To: Contreras, Alejandro E
Cc: Costanzo, Rosa M; 'Maria P'
Subject: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

Good Evening Alejandro & Rosa

RE: Contract (RFP) 13-11355-CS

On Friday, February 12, 2016, we had a meeting and our Contract (RFP) 13-11355-CS - Air Ambulance Transportation was discussed.

On Thursday, February 18th, 2016, I sent an email to Alex & Maria (Trinity's office manager) advising Maria of what was discussed and agreed upon at our February 12th meeting. I provided her with the Transport Procedure for

Incoming & Outgoing Patients for Jackson (see attached). The next day, Trinity commenced transportation using our Contract and Rates. The procedure as follows:

1. Incoming patients, Trinity will obtain "Financial Clearance" & Acceptance from the Jackson International or Jackson Domestic Department, and then Trinity will transport and then bill Jackson
2. Outgoing patients, Trinity will confirm health insurance coverage (for Subrogation purposes) and then Trinity will transport and then bill Jackson

Since February 18th, a total of 20 new patients have been brought to Jackson. Most if not all, have been of high acuity, requiring ICU stays. These patients could have been accepted at other facilities.

On each and every case, Trinity obtained from the International Department (and I believe one from the Domestic Department) Financial & Medical Clearances (we have copies of emails from the International Department these "clearances" for each transfer). For cases that could not be financially cleared, we have had to transport to other facilities. Maria then sent invoices, per the Contracted rates, to Ernie, who acknowledged each one. He has requested confirmation of with whom at the Jackson International Department who provided the clearance - and we provided that information to him. He then replied to Maria that he had "approved" the invoice, for each one.

The process appeared to be flowing well so I am not sure what the hold-up is on the payments for the invoices. Can you let us know when we should expect payment. We would like to continue to refer patients to Jackson, since JHS can handle all cases & the outcomes have been positive.

In addition, I have spoken with Rosa with regards to other clients that I believe collaboratively we could approach and present Jackson as the primary care provider. Let me know when you both can meet to further discuss.

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
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Ph: 954-771-7911
Cell: 305-205-0570
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Email: IngerLisa@TrinityAirAmbulance.com
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-----Original Message-----

From: Contreras, Alejandro E [<mailto:Alejandro.Contreras@jhsmiami.org>]
Sent: Friday, April 08, 2016 5:19 PM
To: Verdecia, Ernest; 'maria@trinityairambulance.com'; Corrales, Diamela
Cc: Costanzo, Rosa M; 'ingerlisa@trinityairambulance.com'
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Ernie/Diamela- We need check if patients had insurance and provide this information. If insurance does not pay we need to. Insurance info must be provided so they can bill if they can get pay

-----Original Message-----

From: Verdecia, Ernest
Sent: Friday, April 8, 2016 4:35 PM
To: 'maria@trinityairambulance.com' <maria@trinityairambulance.com>; Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'ingerlisa@trinityairambulance.com' <ingerlisa@trinityairambulance.com>
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Maria

Yes I understand but these are international patients, after I checked with international they advised when a patient is brought into our facility you are to bill patients insurance

Since this is not my normal scope of service I turfed them to international for final approval and that's what was advised yes I gave the initial approval but its up to them for final approval since its their patient

Sorry for the confusion please call me Monday to discuss

Ernie

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From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Friday, April 08, 2016 04:12 PM
To: Verdecia, Ernest
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Thanks for your reply Ernie

I am a little confused. We were advised by Mr. Alejandro Contreras to send invoices to you and you were to send for processing. And when I emailed you the invoices (and 99% are International), you have reviewed them and replied, for example:

1. For date of service January 28, 2016, patient [REDACTED] you wrote back "Approved!! We will process through our system asap" (see attached email "RE: [REDACTED] - Invoice....").
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"RE: [REDACTED] - Invoice..." and you included
ghxodap.jacksonhealthsystems@na.firstsource.com)

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back "received thanks" (see attached email "RE: [REDACTED] ..").

Thank you in advance for the clarification of the process. We wish not to
have any further delays.

Please provide an update on each of the 22 outstanding invoices as to the
status of payment.

Maria

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From: Verdecia, Ernest [<mailto:Ernest.Verdecia@jhsMiami.org>]
Sent: Friday, April 08, 2016 4:00 PM
To: 'maria@trinityairambulance.com'
Cc: Costanzo, Rosa M
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air
Ambulance

Hi Maria,

I've received your invoices, however most of the patients are incoming
international patients. I've forwarded these invoices to Elvia from our
International department for review.

I am available Monday morning to discuss further and may possibly have an
update from Elvia, please feel free to call me then.

Thanks
Ernie

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Cc: Maria P

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Thanks

Ernie

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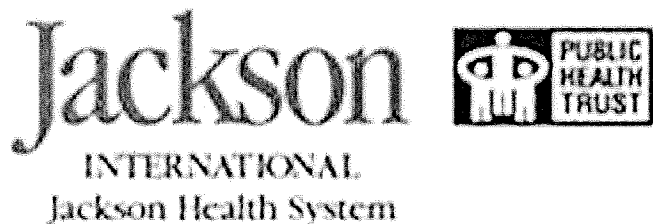
Have a nice weekend

Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

From: Corrales, Diamela <Diamela.Corrales@jhsmiami.org>
Sent: Tuesday, April 12, 2016 10:55 AM
To: Verdecia, Ernest
Subject: RE: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

Thanks Ernie, please keep me posted, International was not aware nor involved in any of these negotiations.

Diamela Corrales
Director of International
Operations and Hospitality Services



Jackson Memorial Hospital
VUMI International Hospitality Center
Office: +1.305.355.1211 Mobile: +1.786.287.1403
24/7 JMH Direct Access On-Call: +1.305.355.1212

From: Verdecia, Ernest
Sent: Tuesday, April 12, 2016 10:52 AM
To: Corrales, Diamela
Subject: FW: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

Please read this attachment I'm checking to see if Alex approved this or not

Ernie

From: Costanzo, Rosa M
Sent: Tuesday, April 12, 2016 8:21 AM
To: Verdecia, Ernest; Fernandez, Luis
Cc: Contreras, Alejandro E
Subject: FW: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

FYI- this should help with payment review and approvals.

Thank you
Rosa

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Sent: Monday, April 11, 2016 07:56 PM Eastern Standard Time

To: Contreras, Alejandro E

Cc: Costanzo, Rosa M; 'Maria P'

Subject: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

Good Evening Alejandro & Rosa

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Sent: Friday, April 08, 2016 03:00 PM

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22. March 29, 2016	[REDACTED]	16JHS0329MS	\$15,999.00

Maria

-----Original Message-----

From: Verdecia, Ernest [<mailto:Ernest.Verdecia@jhsmiami.org>]
Sent: Tuesday, April 05, 2016 2:16 PM
To: Inger Lisa Skroder - Trinity Air Ambulance
Cc: Maria P
Subject: RE: JHS invoices

Hi Maria and Lisa,

Please send me all invoices you have pending of patients you have brought into any Jackson facility in the past 60 days

Thanks

Ernie

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance
[<mailto:IngerLisa@TrinityAirAmbulance.com>]
Sent: Saturday, April 02, 2016 11:43 AM
To: Verdecia, Ernest
Cc: Maria P
Subject: JHS invoices

Hi Ernie

Nice speaking with you today.

On another note, can you find out what the status is of our invoices as we have not received payment for some time.

Can we have a conference call on Thursday, April 7th to discuss the status or if you could email Maria the list - thanks !

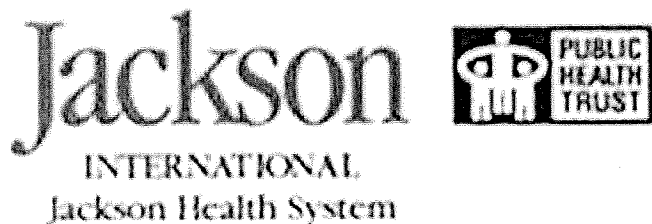
Have a nice weekend

Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

From: Corrales, Diamela <Diamela.Corrales@jhsmiami.org>
Sent: Tuesday, April 12, 2016 10:55 AM
To: Verdecia, Ernest
Subject: RE: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

Thanks Ernie, please keep me posted, International was not aware nor involved in any of these negotiations.

Diamela Corrales
Director of International
Operations and Hospitality Services



Jackson Memorial Hospital
VUMI International Hospitality Center
Office: +1.305.355.1211 Mobile: +1.786.287.1403
24/7 JMH Direct Access On-Call: +1.305.355.1212

From: Verdecia, Ernest
Sent: Tuesday, April 12, 2016 10:52 AM
To: Corrales, Diamela
Subject: FW: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

Please read this attachment I'm checking to see if Alex approved this or not

Ernie

From: Costanzo, Rosa M
Sent: Tuesday, April 12, 2016 8:21 AM
To: Verdecia, Ernest; Fernandez, Luis
Cc: Contreras, Alejandro E
Subject: FW: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

FYI- this should help with payment review and approvals.

Thank you
Rosa

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International [IngerLisa@TrinityAirAmbulance.com]

Sent: Monday, April 11, 2016 07:56 PM Eastern Standard Time

To: Contreras, Alejandro E

Cc: Costanzo, Rosa M; 'Maria P'

Subject: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

Good Evening Alejandro & Rosa

RE: Contract (RFP) 13-11355-CS

On Friday, February 12, 2016, we had a meeting and our Contract (RFP) 13-11355-CS - Air Ambulance Transportation was discussed.

On Thursday, February 18th, 2016, I sent an email to Alex & Maria (Trinity's office manager) advising Maria of what was discussed and agreed upon at our February 12th meeting. I provided her with the Transport Procedure for Incoming & Outgoing Patients for Jackson (see attached). The next day, Trinity commenced transportation using our Contract and Rates. The procedure as follows:

1. Incoming patients, Trinity will obtain "Financial Clearance" & Acceptance from the Jackson International or Jackson Domestic Department, and then Trinity will transport and then bill Jackson
2. Outgoing patients, Trinity will confirm health insurance coverage (for Subrogation purposes) and then Trinity will transport and then bill Jackson

Since February 18th, a total of 20 new patients have been brought to Jackson. Most if not all, have been of high acuity, requiring ICU stays. These patients could have been accepted at other facilities.

On each and every case, Trinity obtained from the International Department (and I believe one from the Domestic Department) Financial & Medical Clearances (we have copies of emails from the International Department these "clearances" for each transfer). For cases that could not be financially cleared, we have had to transport to other facilities. Maria then sent invoices, per the Contracted rates, to Ernie, who acknowledged each one. He has requested confirmation of with whom at the Jackson International Department who provided the clearance - and we provided that information to him. He then replied to Maria that he had "approved" the invoice, for each one.

The process appeared to be flowing well so I am not sure what the hold-up is on the payments for the invoices. Can you let us know when we should expect payment. We would like to continue to refer patients to Jackson, since JHS can handle all cases & the outcomes have been positive.

In addition, I have spoken with Rosa with regards to other clients that I believe collaboratively we could approach and present Jackson as the primary care provider. Let me know when you both can meet to further discuss.

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882

Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

This transmission and any information attached to it may be confidential and is intended solely for the use of the individual or entity to which it is addressed. If you are not the intended recipient, please notify the sender immediately by calling (954) 771-7911. If you are not the intended recipient or the person responsible for delivering the transmission to the intended recipient, you are advised that any use, dissemination, forwarding, printing, or copying of this information is strictly prohibited.

-----Original Message-----

From: Contreras, Alejandro E [<mailto:Alejandro.Contreras@jhsmiami.org>]
Sent: Friday, April 08, 2016 5:19 PM
To: Verdecia, Ernest; 'maria@trinityairambulance.com'; Corrales, Diamela
Cc: Costanzo, Rosa M; 'ingerlisa@trinityairambulance.com'
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Ernie/Diamela- We need check if patients had insurance and provide this information. If insurance does not pay we need to. Insurance info must be provided so they can bill if they can get pay

-----Original Message-----

From: Verdecia, Ernest
Sent: Friday, April 8, 2016 4:35 PM
To: 'maria@trinityairambulance.com' <maria@trinityairambulance.com>; Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'ingerlisa@trinityairambulance.com' <ingerlisa@trinityairambulance.com>
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Maria

Yes I understand but these are international patients, after I checked with international they advised when a patient is brought into our facility you are to bill patients insurance

Since this is not my normal scope of service I turfed them to international for final approval and that's what was advised yes I gave the initial approval but its up to them for final approval since its their patient

Sorry for the confusion please call me Monday to discuss

Ernie

----- Original Message -----

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Friday, April 08, 2016 04:12 PM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance' <ingerlisa@trinityairambulance.com>
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Thanks for your reply Ernie

I am a little confused. We were advised by Mr. Alejandro Contreras to send invoices to you and you were to send for processing. And when I emailed you the invoices (and 99% are International), you have reviewed them and replied, for example:

1. For date of service January 28, 2016, patient [REDACTED] you wrote back "Approved!! We will process through our system asap" (see attached email "RE: [REDACTED] - Invoice....").
2. For date of service February 19, 2016, patient [REDACTED] you wrote back " Approved ! Please process asap ! Thanks" (see attached email "RE: [REDACTED] - Invoice...") and you included ghxodap.jacksonhealthsystems@na.firstsource.com)
3. For date of service March 17, 2016, patient [REDACTED] you wrote back "received thanks" (see attached email "RE: [REDACTED] ..").

Thank you in advance for the clarification of the process. We wish not to have any further delays.

Please provide an update on each of the 22 outstanding invoices as to the status of payment.

Maria

-----Original Message-----

From: Verdecia, Ernest [<mailto:Ernest.Verdecia@jhs-miami.org>]
Sent: Friday, April 08, 2016 4:00 PM
To: 'maria@trinityairambulance.com'
Cc: Costanzo, Rosa M
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Maria,

I've received your invoices, however most of the patients are incoming international patients. I've forwarded these invoices to Elvia from our International department for review.

I am available Monday morning to discuss further and may possibly have an update from Elvia, please feel free to call me then.

Thanks

Ernie

----- Original Message -----

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Friday, April 08, 2016 03:00 PM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; maria@trinityairambulance.com
<maria@trinityairambulance.com>
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

I am following up to ensure you received my email with regards to the 22 invoices.

Can you let me know what the status is on each ?

Maria

-----Original Message-----

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Thursday, April 07, 2016 11:59 AM
To: 'Verdecia, Ernest'
Cc: Costanzo, Rosa M; maria@trinityairambulance.com
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

Thank you for your email. As requested please find the list of twenty two (22) invoices. I have included the following: date of service, patient name, invoice number and amount due.

Please advise payment status for each.

1. October 17, 2015	[REDACTED]	15JHS1017YB	\$19,920.00
2. January 28, 2016	[REDACTED]	16JHS0128KS	\$10,000.00
3. February 19, 2016	[REDACTED]	16JHS0219BH	\$17,254.88
4. February 22, 2016	[REDACTED]	16JHS0222WM	\$15,134.40
5. February 23, 2016	[REDACTED]	16JHS0223MZ	\$15,134.40
6. February 27, 2016	[REDACTED]	16JHS0226GB	\$10,089.00
7. February 28, 2016	[REDACTED]	16JHS0228LS	\$7,185.20
8. March 4, 2016	[REDACTED]	16JHS0303AR	\$25,055.00
9. March 7, 2016	[REDACTED]	16JHS0307GD	\$17,272.50
10. March 8, 2016	[REDACTED]	16JHS0308DG	\$16,922.50
11. March 8, 2016	[REDACTED]	16JHS0308SS	\$16,922.50
12. March 10, 2016	[REDACTED]	16JHS0310CK	\$16,772.60
13. March 11, 2016	[REDACTED]	16JHS0311KC	\$8,740.50
14. March 11, 2016	[REDACTED]	16JHS0311DB	\$15,682.10
15. March 11, 2016	[REDACTED]	16JHS0311JB	\$8,673.38
16. March 14, 2016	[REDACTED]	16JHS0314VP	\$17,159.10
17. March 17, 2016	[REDACTED]	16JHS0317PA	\$10,675.00
18. March 17, 2016	[REDACTED]	16JHS0317AA	\$17,632.00
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Maria

-----Original Message-----

From: Verdecia, Ernest [<mailto:Ernest.Verdecia@jhsmiami.org>]
Sent: Tuesday, April 05, 2016 2:16 PM
To: Inger Lisa Skroder - Trinity Air Ambulance
Cc: Maria P
Subject: RE: JHS invoices

Hi Maria and Lisa,

Please send me all invoices you have pending of patients you have brought into any Jackson facility in the past 60 days

Thanks

Ernie

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance
[<mailto:IngerLisa@TrinityAirAmbulance.com>]
Sent: Saturday, April 02, 2016 11:43 AM
To: Verdecia, Ernest
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Subject: JHS invoices

Hi Ernie

Nice speaking with you today.

On another note, can you find out what the status is of our invoices as we have not received payment for some time.

Can we have a conference call on Thursday, April 7th to discuss the status or if you could email Maria the list - thanks !

Have a nice weekend

Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

From: luis.fernandez@jhsmiami.org
Sent: Tuesday, April 12, 2016 11:25 AM
To: Ernest.Verdecia@jhsmiami.org
Subject: RE: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

Yes, approve based on the transport procedure you attached and Alex's comments from last week.

Luis (Louie) Fernandez
Director, Operations
Jackson Health System
Executive Offices – West Wing
1611 NW 12th Avenue
Miami, FL 33136
O-(305) 585-6200
M-(786) 620-6450
F- (305) 324-0065
luis.fernandez@jhsmiami.org



From: Verdecia, Ernest
Sent: Tuesday, April 12, 2016 10:51 AM
To: Fernandez, Luis
Subject: FW: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

Your thoughts?? If Alex agreed I don't have a problem approving these invoices

Ernie

From: Costanzo, Rosa M
Sent: Tuesday, April 12, 2016 8:21 AM
To: Verdecia, Ernest; Fernandez, Luis
Cc: Contreras, Alejandro E
Subject: FW: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

FYI- this should help with payment review and approvals.

Thank you
Rosa

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International [IngerLisa@TrinityAirAmbulance.com]

Sent: Monday, April 11, 2016 07:56 PM Eastern Standard Time

To: Contreras, Alejandro E

Cc: Costanzo, Rosa M; 'Maria P'

Subject: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

Good Evening Alejandro & Rosa

RE: Contract (RFP) 13-11355-CS

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Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882

Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

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Cc: Costanzo, Rosa M; 'ingerlisa@trinityairambulance.com'
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

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Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>; 'ingerlisa@trinityairambulance.com' <ingerlisa@trinityairambulance.com>
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Maria

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Sent: Friday, April 08, 2016 4:00 PM
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Cc: Costanzo, Rosa M
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

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I am available Monday morning to discuss further and may possibly have an update from Elvia, please feel free to call me then.

Thanks

Ernie

----- Original Message -----

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]

Sent: Friday, April 08, 2016 03:00 PM

To: Verdecia, Ernest

Cc: Costanzo, Rosa M; maria@trinityairambulance.com

<maria@trinityairambulance.com>

Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

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Maria

-----Original Message-----

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]

Sent: Thursday, April 07, 2016 11:59 AM

To: 'Verdecia, Ernest'

Cc: Costanzo, Rosa M; maria@trinityairambulance.com

Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

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22. March 29, 2016	[REDACTED]	16JHS0329MS	\$15,999.00

Maria

-----Original Message-----

From: Verdecia, Ernest [<mailto:Ernest.Verdecia@jhsmiami.org>]
Sent: Tuesday, April 05, 2016 2:16 PM
To: Inger Lisa Skroder - Trinity Air Ambulance
Cc: Maria P
Subject: RE: JHS invoices

Hi Maria and Lisa,

Please send me all invoices you have pending of patients you have brought into any Jackson facility in the past 60 days

Thanks

Ernie

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance
[<mailto:IngerLisa@TrinityAirAmbulance.com>]
Sent: Saturday, April 02, 2016 11:43 AM
To: Verdecia, Ernest
Cc: Maria P
Subject: JHS invoices

Hi Ernie

Nice speaking with you today.

On another note, can you find out what the status is of our invoices as we have not received payment for some time.

Can we have a conference call on Thursday, April 7th to discuss the status or if you could email Maria the list - thanks !

Have a nice weekend

Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

From: Corrales, Diamela <Diamela.Corrales@jhsmiami.org>
Sent: Tuesday, April 12, 2016 11:31 AM
To: Fernandez, Luis; Verdecia, Ernest; Contreras, Alejandro E
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Can we please discuss before payment?
Thanks

Diamela Corrales
Director of International
Operations and Hospitality Services

Jackson Memorial Hospital
VUMI International Hospitality Center
Office: +1.305.355.1211 Mobile: +1.786.287.1403
24/7 JMH Direct Access On-Call: +1.305.355.1212

-----Original Message-----

From: Fernandez, Luis
Sent: Tuesday, April 12, 2016 11:28 AM
To: Costanzo, Rosa M; 'Inger Lisa Skroder - Trinity Air Ambulance International'; Verdecia, Ernest; Corrales, Diamela; Quintero, Victoria
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Greetings. Mr. Verdecia is processing the invoices for payment. We apologize for the delay.

Luis (Louie) Fernandez
Director, Operations
Jackson Health System
Executive Offices - West Wing
1611 NW 12th Avenue
Miami, FL 33136
O-(305) 585-6200
M-(786) 620-6450
F- (305) 324-0065
luis.fernandez@jhsmiami.org

-----Original Message-----

From: Costanzo, Rosa M
Sent: Tuesday, April 12, 2016 11:17 AM

To: 'Inger Lisa Skroder - Trinity Air Ambulance International'; Verdecia, Ernest; Corrales, Diamela; Quintero, Victoria
Cc: Fernandez, Luis
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

I do not have an update. I am copying the team that is working on this.

Rosa M. Costanzo, CMRP, CPPB, CPSM
VP/ Chief Procurement Officer

Jackson Health System
Jackson Medical Towers
1500 NW 12 Avenue - Suite 820
Miami, Florida 33136-1096
Telephone: (305) 585-7333
Facsimile: (305) 585-1412
RCostanz@jhsmiami.org
Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International [mailto:IngerLisa@TrinityAirAmbulance.com]
Sent: Tuesday, April 12, 2016 10:26 AM
To: Costanzo, Rosa M
Cc: 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance'
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Good Morning Rosa

Did you get an update on the 22 invoices ?

1. October 17, 2015	15JHS1017YB	\$19,920.00	
2. January 28, 2016	16JHS0128KS	\$10,000.00	
3. February 19, 2016	16JHS0219BH	\$17,254.88	
4. February 22, 2016	16JHS0222WM	\$15,134.40	
5. February 23, 2016	16JHS0223MZ	\$15,134.40	
6. February 27, 2016	16JHS0226GB	\$10,089.00	
7. February 28, 2016	16JHS0228LS	\$7,185.20	
8. March 4, 2016	16JHS0303AR	\$25,055.00	
9. March 7, 2016	16JHS0307GD	\$17,272.50	
10. March 8, 2018	16JHS0308DG	\$16,922.50	
11. March 8, 2016	16JHS0308SS	\$16,922.50	
12. March 10, 2016	16JHS0310CK	\$16,772.60	
13. March 11, 2016	16JHS0311KC	\$8,740.50	
14. March 11, 2016	16JHS0311DB	\$15,682.10	
15. March 11, 2016	16JHS0311JB	\$8,673.38	
16. March 14, 2016	16JHS0314VP	\$17,159.10	
17. March 17, 2016	16JHS0317PA	\$10,675.00	
18. March 17, 2016	bourg 16JHS0317AA	\$17,632.00	
19. March 27, 2016	16JHS0327FV	\$6,742.80	
20. March 27, 2016	16JHS0327SQ	\$30,904.50	

21. March 28, 2016		16JHS0328NM	\$20,201.00
22. March 29, 2016		16JHS0329MS	\$15,999.00

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882

Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

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-----Original Message-----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Monday, April 11, 2016 11:17 AM
To: 'Verdecia, Ernest'
Cc: 'Costanzo, Rosa M'; 'Fernandez, Luis'; 'Tor Skroder'; maria@trinityairambulance.com; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance'
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Good Afternoon Ernie

Thursday, April 14, 2016 at 10:30 AM is fine. Our airport facility is Sano Jet Center is located at 1525 NW 56th Street, Fort Lauderdale, Florida 33309. I have attached the directions for you. We will see you then.

Best regards,

Maria

-----Original Message-----

From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhs-miami.org]
Sent: Monday, April 11, 2016 10:53 AM
To: Trinity Air Ambulance - Maria
Cc: Costanzo, Rosa M; Fernandez, Luis
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Maria,

We would like to have a meeting at your facility to discuss process and procedure to expedite your invoices. Luis Fernandez and myself would be available this Thursday to go up and visit your site at around 1030am. Please let me know if this is good with you and if not give me some date sand times that work.

Thanks

Ernie

-----Original Message-----

From: Trinity Air Ambulace - Maria [mailto:maria@trinityairambulance.com]
Sent: Friday, April 08, 2016 3:00 PM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; maria@trinityairambulance.com
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

I am following up to ensure you received my email with regards to the 22 invoices. Can you let me know what the status is on each ?

Maria

-----Original Message-----

From: Trinity Air Ambulace - Maria [mailto:maria@trinityairambulance.com]
Sent: Thursday, April 07, 2016 11:59 AM
To: 'Verdecia, Ernest'
Cc: Costanzo, Rosa M; maria@trinityairambulance.com
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

Thank you for your email. As requested please find the list of twenty two (22) invoices. I have included the following: date of service, patient name, invoice number and amount due.

Please advise payment status for each.

1. October 17, 2015	[REDACTED]	15JHS1017YB	\$19,920.00	
2. January 28, 2016	[REDACTED]	16JHS0128KS	\$10,000.00	
3. February 19, 2016	[REDACTED]	16JHS0219BH	\$17,254.88	
4. February 22, 2016	[REDACTED]	16JHS0222WM	\$15,134.40	
5. February 23, 2016	[REDACTED]	16JHS0223MZ		\$15,134.40
6. February 27, 2016	[REDACTED]	16JHS0226GB	\$10,089.00	
7. February 28, 2016	[REDACTED]	16JHS0228LS	\$7,185.20	
8. March 4, 2016	[REDACTED]	16JHS0303AR	\$25,055.00	

9. March 7, 2016	[REDACTED] 16JHS0307GD	\$17,272.50
10. March 8, 2016	[REDACTED] 16JHS0308DG	\$16,922.50
11. March 8, 2016	[REDACTED] 16JHS0308SS	\$16,922.50
12. March 10, 2016	[REDACTED] anceki 16JHS0310CK	\$16,772.60
13. March 11, 2016	[REDACTED] 16JHS0311KC	\$8,740.50
14. March 11, 2016	[REDACTED] 16JHS0311DB	\$15,682.10
15. March 11, 2016	[REDACTED] 16JHS0311JB	\$8,673.38
16. March 14, 2016	[REDACTED] 16JHS0314VP	\$17,159.10
17. March 17, 2016	[REDACTED] 16JHS0317PA	\$10,675.00
18. March 17, 2016	[REDACTED] 16JHS0317AA	\$17,632.00
19. March 27, 2016	[REDACTED] 16JHS0327FV	\$6,742.80
20. March 27, 2016	[REDACTED] 16JHS0327SQ	\$30,904.50
21. March 28, 2016	[REDACTED] 16JHS0328NM	\$20,201.00
22. March 29, 2016	[REDACTED] 16JHS0329MS	\$15,999.00

Maria

-----Original Message-----

From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhsmiami.org]

Sent: Tuesday, April 05, 2016 2:16 PM

To: Inger Lisa Skroder - Trinity Air Ambulance

Cc: Maria P

Subject: RE: JHS invoices

Hi Maria and Lisa,

Please send me all invoices you have pending of patients you have brought into any Jackson facility in the past 60 days

Thanks

Ernie

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance [mailto:IngerLisa@TrinityAirAmbulance.com]

Sent: Saturday, April 02, 2016 11:43 AM

To: Verdecia, Ernest

Cc: Maria P

Subject: JHS invoices

Hi Ernie

Nice speaking with you today.

On another note, can you find out what the status is of our invoices as we have not received payment for some time.

Can we have a conference call on Thursday, April 7th to discuss the status or if you could email Maria the list - thanks !

Have a nice weekend

Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

From: Diamela.Corrales@jhsmiami.org
Sent: Tuesday, April 12, 2016 11:31 AM
To: luis.fernandez@jhsmiami.org; Ernest.Verdecia@jhsmiami.org;
Alejandro.Contreras@jhsmiami.org
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Can we please discuss before payment?
Thanks

Diamela Corrales
Director of International
Operations and Hospitality Services

Jackson Memorial Hospital
VUMI International Hospitality Center
Office: +1.305.355.1211 Mobile: +1.786.287.1403
24/7 JMH Direct Access On-Call: +1.305.355.1212

-----Original Message-----

From: Fernandez, Luis
Sent: Tuesday, April 12, 2016 11:28 AM
To: Costanzo, Rosa M; 'Inger Lisa Skroder - Trinity Air Ambulance International'; Verdecia, Ernest; Corrales, Diamela;
Quintero, Victoria
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Greetings. Mr. Verdecia is processing the invoices for payment. We apologize for the delay.

Luis (Louie) Fernandez
Director, Operations
Jackson Health System
Executive Offices - West Wing
1611 NW 12th Avenue
Miami, FL 33136
O-(305) 585-6200
M-(786) 620-6450
F- (305) 324-0065
luis.fernandez@jhsmiami.org

-----Original Message-----

From: Costanzo, Rosa M

Sent: Tuesday, April 12, 2016 11:17 AM

To: 'Inger Lisa Skroder - Trinity Air Ambulance International'; Verdecia, Ernest; Corrales, Diamela; Quintero, Victoria

Cc: Fernandez, Luis

Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

I do not have an update. I am copying the team that is working on this.

Rosa M. Costanzo, CMRP, CPPB, CPSM

VP/ Chief Procurement Officer

Jackson Health System

Jackson Medical Towers

1500 NW 12 Avenue - Suite 820

Miami, Florida 33136-1096

Telephone: (305) 585-7333

Facsimile: (305) 585-1412

RCostanz@jhsmiami.org

Website: <http://www.jacksonhealth.org/vendors-procurement.asp>

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International [mailto:IngerLisa@TrinityAirAmbulance.com]

Sent: Tuesday, April 12, 2016 10:26 AM

To: Costanzo, Rosa M

Cc: 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance'

Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Good Morning Rosa

Did you get an update on the 22 invoices ?

1. October 17, 2015	15JHS1017YB	\$19,920.00	
2. January 28, 2016	16JHS0128KS	\$10,000.00	
3. February 19, 2016	16JHS0219BH	\$17,254.88	
4. February 22, 2016	16JHS0222WM	\$15,134.40	
5. February 23, 2016	16JHS0223MZ	\$15,134.40	
6. February 27, 2016	16JHS0226GB	\$10,089.00	
7. February 28, 2016	16JHS0228LS	\$7,185.20	
8. March 4, 2016	16JHS0303AR	\$25,055.00	
9. March 7, 2016	16JHS0307GD	\$17,272.50	
10. March 8, 2018	16JHS0308DG	\$16,922.50	
11. March 8, 2016	16JHS0308SS	\$16,922.50	
12. March 10, 2016	ki 16JHS0310CK	\$16,772.60	
13. March 11, 2016	16JHS0311KC	\$8,740.50	
14. March 11, 2016	16JHS0311DB	\$15,682.10	
15. March 11, 2016	16JHS0311JB	\$8,673.38	
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17. March 17, 2016	16JHS0317PA	\$10,675.00	
18. March 17, 2016	16JHS0317AA	\$17,632.00	
19. March 27, 2016	16JHS0327FV	\$6,742.80	

20. March 27, 2016		16JHS0327SQ	\$30,904.50
21. March 28, 2016		16JHS0328NM	\$20,201.00
22. March 29, 2016		16JHS0329MS	\$15,999.00

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882

Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

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-----Original Message-----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Monday, April 11, 2016 11:17 AM
To: 'Verdecia, Ernest'
Cc: 'Costanzo, Rosa M'; 'Fernandez, Luis'; 'Tor Skroder'; maria@trinityairambulance.com; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance'
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Good Afternoon Ernie

Thursday, April 14, 2016 at 10:30 AM is fine. Our airport facility is Sano Jet Center is located at 1525 NW 56th Street, Fort Lauderdale, Florida 33309. I have attached the directions for you. We will see you then.

Best regards,

Maria

-----Original Message-----

From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhsmiami.org]
Sent: Monday, April 11, 2016 10:53 AM
To: Trinity Air Ambulance - Maria
Cc: Costanzo, Rosa M; Fernandez, Luis

Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Maria,

We would like to have a meeting at your facility to discuss process and procedure to expedite your invoices. Luis Fernandez and myself would be available this Thursday to go up and visit your site at around 1030am. Please let me know if this is good with you and if not give me some date and times that work.

Thanks

Ernie

-----Original Message-----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Friday, April 08, 2016 3:00 PM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; maria@trinityairambulance.com
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

I am following up to ensure you received my email with regards to the 22 invoices. Can you let me know what the status is on each ?

Maria

-----Original Message-----

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Thursday, April 07, 2016 11:59 AM
To: 'Verdecia, Ernest'
Cc: Costanzo, Rosa M; maria@trinityairambulance.com
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

Thank you for your email. As requested please find the list of twenty two (22) invoices. I have included the following: date of service, patient name, invoice number and amount due.

Please advise payment status for each.

1. October 17, 2015	[REDACTED]	15JHS1017YB	\$19,920.00	
2. January 28, 2016	[REDACTED]	t 16JHS0128KS	\$10,000.00	
3. February 19, 2016	[REDACTED]	16JHS0219BH	\$17,254.88	
4. February 22, 2016	[REDACTED]	16JHS0222WM	\$15,134.40	
5. February 23, 2016	[REDACTED]	riah 16JHS0223MZ		\$15,134.40
6. February 27, 2016	[REDACTED]	16JHS0226GB	\$10,089.00	
7. February 28, 2016	[REDACTED]	16JHS0228LS	\$7,185.20	

8. March 4, 2016	[REDACTED] ts	16JHS0303AR	\$25,055.00
9. March 7, 2016	[REDACTED] son	16JHS0307GD	\$17,272.50
10. March 8, 2018	[REDACTED]	16JHS0308DG	\$16,922.50
11. March 8, 2016	[REDACTED]	16JHS0308SS	\$16,922.50
12. March 10, 2016	[REDACTED]	16JHS0310CK	\$16,772.60
13. March 11, 2016	[REDACTED]	16JHS0311KC	\$8,740.50
14. March 11, 2016	[REDACTED]	16JHS0311DB	\$15,682.10
15. March 11, 2016	[REDACTED] dt	16JHS0311JB	\$8,673.38
16. March 14, 2016	[REDACTED]	16JHS0314VP	\$17,159.10
17. March 17, 2016	[REDACTED]	16JHS0317PA	\$10,675.00
18. March 17, 2016	[REDACTED]	16JHS0317AA	\$17,632.00
19. March 27, 2016	[REDACTED]	16JHS0327FV	\$6,742.80
20. March 27, 2016	[REDACTED]	16JHS0327SQ	\$30,904.50
21. March 28, 2016	[REDACTED]	16JHS0328NM	\$20,201.00
22. March 29, 2016	[REDACTED]	16JHS0329MS	\$15,999.00

Maria

-----Original Message-----

From: Verdecia, Ernest [mailto:Ernest.Verdecia@jhsmiami.org]

Sent: Tuesday, April 05, 2016 2:16 PM

To: Inger Lisa Skroder - Trinity Air Ambulance

Cc: Maria P

Subject: RE: JHS invoices

Hi Maria and Lisa,

Please send me all invoices you have pending of patients you have brought into any Jackson facility in the past 60 days

Thanks

Ernie

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance [mailto:IngerLisa@TrinityAirAmbulance.com]

Sent: Saturday, April 02, 2016 11:43 AM

To: Verdecia, Ernest

Cc: Maria P

Subject: JHS invoices

Hi Ernie

Nice speaking with you today.

On another note, can you find out what the status is of our invoices as we have not received payment for some time.

Can we have a conference call on Thursday, April 7th to discuss the status or if you could email Maria the list - thanks !

Have a nice weekend

Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

From: Antonio.Cabrera1@jhsmiami.org
Sent: Wednesday, April 13, 2016 1:02 PM
To: maria@trinityairambulance.com; VQuintero@jhsmiami.org
Cc: FAlvarez@jhsmiami.org; RCostanz@jhsmiami.org; Andrew.Figueroa@jhsmiami.org
Subject: RE: JHS 3 remaining Invoices // Trinity Air Ambulance
Attachments: Inv_15JHS1017YB_from_Trinity_Air_Ambulance_International_LLC_10568.pdf; Inv_16JHS0122WM_from_Trinity_Air_Ambulance_International_LLC_8564.pdf; Inv_16JHS0223_from_Trinity_Air_Ambulance_International_LLC_7412.pdf

I don't see these currently available for payment. They may still be being processed. Vicky or Fidel, do you have any information on the attached invoices?

From: Trinity Air Ambulance - Maria [mailto:maria@trinityairambulance.com]
Sent: Wednesday, April 13, 2016 12:39 PM
To: Cabrera, Antonio T; Quintero, Victoria
Cc: Alvarez, Fidel; Costanzo, Rosa M; Figueroa, Andrew J; maria@trinityairambulance.com
Subject: RE: JHS 3 remaining Invoices // Trinity Air Ambulance

Tony,

I just saw that my colleague Alina processed payment for 3 of the invoices. We have only 3 invoices outstanding as follows:

1. October 17, 2015 [REDACTED] AA (FXE - San Juan
) JHS 15JHS1017YB \$19,920.00 Invoice emailed October 23, 2015
2. February 22, 2016 [REDACTED] AA (Cozumel - FXE
) JHS 16JHS0222WM \$15,134.40 February 23, 2016 invoice
emailed
3. February 23, 2016 Organ Transport (FXE-LIT-FXE
) JHS 16JHS0223 \$13,659.43 March 8, 2016 invoice emailed

Can you please advise me if we can get payment today or tomorrow ?

Kind Regards,

Maria Pejdanovska
Trinity Air Ambulance International, LLC
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308

Ph: 954-771-7911
Fax: 954-771-4882



Email: Maria@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com



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From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Wednesday, April 13, 2016 12:33 PM
To: 'Cabrera, Antonio T'; 'Quintero, Victoria'
Cc: 'Alvarez, Fidel'; 'Costanzo, Rosa M'; Andrew J. Figueroa; maria@trinityairambulance.com
Subject: JHS: 6 remaining Invoices // Trinity Air Ambulance

Tony,

Thank you very much, we were able to process the payments.

As of now we are showing just the following 6 invoices as outstanding:

1. October 17, 2015 [REDACTED] AA (FXE - San Juan) JHS 15JHS1017YB \$19,920.00 Invoice emailed October 23, 2015
2. February 13, 2016 Organ Transport (FXE-MIA-APF-MIA-FXE) JHS 16JHS0213 \$9,769.24 March 8, 2016 invoice emailed
3. February 18, 2016 Organ Transport (MIA-Gainesville -MIA) JHS 16JHS0218 \$15,925.00 February 19, 2016 invoice emailed
4. February 21, 2016 Organ Transport (FXE-MIA-BHM-MIA-FXE) JHS 16JHS0221 \$15,492.04 March 8, 2016 invoice emailed
5. February 22, 2016 [REDACTED] AA (Cozumel - FXE) JHS 16JHS0222WM \$15,134.40 February 23, 2016 invoice emailed
6. February 23, 2016 Organ Transport (FXE-LIT-FXE) JHS 16JHS0223 \$13,659.43 March 8, 2016 invoice emailed

I have attached the 6 invoices for your convenience.

Can you please advise me if we can get payment today or tomorrow ?

Kind Regards,

Maria Pejdanovska
Trinity Air Ambulance International, LLC
3535 Galt Ocean Drive

Fort Lauderdale, Florida 33308

Ph: 954-771-7911

Fax: 954-771-4882



Email: Maria@TrinityAirAmbulance.com

Website: www.TrinityAirAmbulance.com



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-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International [<mailto:IngerLisa@TrinityAirAmbulance.com>]

Sent: Wednesday, April 13, 2016 10:56 AM

To: 'Cabrera, Antonio T'; 'Quintero, Victoria'

Cc: 'Maria P'; 'Alvarez, Fidel'; 'Costanzo, Rosa M'

Subject: RE: Invoices // Trinity Air Ambulance

Tony

Thank you very much. We appreciate your quick attention to this

Inger Lisa Skroder, MN, ARNP

Trinity Air Ambulance International

3535 Galt Ocean Drive

Fort Lauderdale, Florida 33308

Ph: 954-771-7911

Cell: 305-205-0570

Fax: 954-771-4882

Email: IngerLisa@TrinityAirAmbulance.com

Website: www.TrinityAirAmbulance.com

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-----Original Message-----

From: Cabrera, Antonio T [mailto:Antonio.Cabrera1@jhsmiami.org]
Sent: Wednesday, April 13, 2016 11:03 AM
To: Quintero, Victoria
Cc: 'Maria P'; Alvarez, Fidel; 'Inger Lisa Skroder - Trinity Air Ambulance International'; Costanzo, Rosa M
Subject: RE: Invoices // Trinity Air Ambulance

I've voided yesterday's payment and have successfully reissued via separate payments as follow:

1. - 88,526.38
2. - 87,633.16
3. - 84,787.55
4. - 85,951.80
5. - 84,736.50
6. - 7,185.20

This should hopefully resolve the issue. Please let me know if this is not the case.

Thank you,

Antonio T. Cabrera

Jackson Health System
Treasury and Reimbursement

(P): 786-466-8053
(F): 305-355-2333
antonio.cabrera1@jhsmiami.org

-----Original Message-----

From: Quintero, Victoria
Sent: Wednesday, April 13, 2016 9:37 AM
To: Cabrera, Antonio T
Cc: 'Maria P'; Alvarez, Fidel; 'Inger Lisa Skroder - Trinity Air Ambulance International'; Costanzo, Rosa M
Subject: RE: Invoices // Trinity Air Ambulance

Tony - FYI

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International [mailto:IngerLisa@TrinityAirAmbulance.com]

Sent: Wednesday, April 13, 2016 9:27 AM
To: Costanzo, Rosa M
Cc: 'Maria P'; Alvarez, Fidel; Quintero, Victoria
Subject: RE: Invoices // Trinity Air Ambulance

Good Morning Rosa

Yes, we did received the payment notice. Thank you very much...

However, on our end, our electronic system will not allow more that 99,999.99 per transaction

Is it possible to request 5 new payments as follows ?

1. \$ 90,000.00
2. \$ 90,000.00
3. \$ 90,000.00
4. \$90,000.00
5. \$ 78,820.59

Who would we need to speak to for this

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882

Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

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-----Original Message-----

From: Costanzo, Rosa M [mailto:RCostanz@jhsmiami.org]
Sent: Wednesday, April 13, 2016 8:19 AM
To: 'Inger Lisa SKRODER, MN, ARNP'
Subject: Invoices

An additional payment of 438,820.59 was made yesterday. Paid with PMS payment# 2003131.

From: Antonio.Cabrera1@jhsmiami.org
Sent: Wednesday, April 13, 2016 11:03 AM
To: VQuintero@jhsmiami.org
Cc: Maria@TrinityAirAmbulance.com; FAlvarez@jhsmiami.org;
IngerLisa@TrinityAirAmbulance.com; RCostanz@jhsmiami.org
Subject: RE: Invoices // Trinity Air Ambulance

I've voided yesterday's payment and have successfully reissued via separate payments as follow:

1. - 88,526.38
2. - 87,633.16
3. - 84,787.55
4. - 85,951.80
5. - 84,736.50
6. - 7,185.20

This should hopefully resolve the issue. Please let me know if this is not the case.

Thank you,

Antonio T. Cabrera

Jackson Health System
Treasury and Reimbursement

(P): 786-466-8053
(F): 305-355-2333
antonio.cabrera1@jhsmiami.org

-----Original Message-----

From: Quintero, Victoria
Sent: Wednesday, April 13, 2016 9:37 AM
To: Cabrera, Antonio T
Cc: 'Maria P'; Alvarez, Fidel; 'Inger Lisa Skroder - Trinity Air Ambulance International'; Costanzo, Rosa M
Subject: RE: Invoices // Trinity Air Ambulance

Tony - FYI

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International [mailto:IngerLisa@TrinityAirAmbulance.com]
Sent: Wednesday, April 13, 2016 9:27 AM
To: Costanzo, Rosa M
Cc: 'Maria P'; Alvarez, Fidel; Quintero, Victoria
Subject: RE: Invoices // Trinity Air Ambulance

Good Morning Rosa

Yes, we did received the payment notice. Thank you very much...

However, on our end, our electronic system will not allow more that 99,999.99 per transaction

Is it possible to request 5 new payments as follows ?

1. \$ 90,000.00
2. \$ 90,000.00
3. \$ 90,000.00
4. \$90,000.00
5. \$ 78,820.59

Who would we need to speak to for this

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882

Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

This transmission and any information attached to it may be confidential and is intended solely for the use of the individual or entity to which it is addressed. If you are not the intended recipient, please notify the sender immediately by calling (954) 771-7911. If you are not the intended recipient or the person responsible for delivering the transmission to the intended recipient, you are advised that any use, dissemination, forwarding, printing, or copying of this information is strictly prohibited.

-----Original Message-----

From: Costanzo, Rosa M [mailto:RCostanz@jhsmiami.org]
Sent: Wednesday, April 13, 2016 8:19 AM
To: 'Inger Lisa SKRODER, MN, ARNP'
Subject: Invoices

An additional payment of 438,820.59 was made yesterday. Paid with PMS payment# 2003131.

From: Antonio.Cabrera1@jhsmiami.org
Sent: Wednesday, April 13, 2016 11:03 AM
To: VQuintero@jhsmiami.org
Cc: Maria@TrinityAirAmbulance.com; FAlvarez@jhsmiami.org;
IngerLisa@TrinityAirAmbulance.com; RCostanz@jhsmiami.org
Subject: RE: Invoices // Trinity Air Ambulance

I've voided yesterday's payment and have successfully reissued via separate payments as follow:

1. - 88,526.38
2. - 87,633.16
3. - 84,787.55
4. - 85,951.80
5. - 84,736.50
6. - 7,185.20

This should hopefully resolve the issue. Please let me know if this is not the case.

Thank you,

Antonio T. Cabrera

Jackson Health System
Treasury and Reimbursement

(P): 786-466-8053
(F): 305-355-2333
antonio.cabrera1@jhsmiami.org

-----Original Message-----

From: Quintero, Victoria
Sent: Wednesday, April 13, 2016 9:37 AM
To: Cabrera, Antonio T
Cc: 'Maria P'; Alvarez, Fidel; 'Inger Lisa Skroder - Trinity Air Ambulance International'; Costanzo, Rosa M
Subject: RE: Invoices // Trinity Air Ambulance

Tony - FYI

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Sent: Wednesday, April 13, 2016 9:27 AM
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Trinity Air Ambulance International
3535 Galt Ocean Drive
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Ph: 954-771-7911
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-----Original Message-----

From: Costanzo, Rosa M [mailto:RCostanz@jhsmiami.org]
Sent: Wednesday, April 13, 2016 8:19 AM
To: 'Inger Lisa SKRODER, MN, ARNP'
Subject: Invoices

An additional payment of 438,820.59 was made yesterday. Paid with PMS payment# 2003131.

From: Alejandro.Contreras@jhsmiami.org
Sent: Thursday, April 14, 2016 2:07 PM
To: Andrew.Figueroa@jhsmiami.org; hamilton.clark@jhsmiami.org
Subject: RE: AP for trinity

Please instruct AP not to pay any invoices for Trinity until further notice

From: Figueroa, Andrew J
Sent: Thursday, April 14, 2016 2:00 PM
To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>; Clark, Hamilton W <hamilton.clark@jhsmiami.org>
Subject: RE: AP for trinity

Attached is everything that has been paid by AP for FY15 and FY16 through 4/14/16. The only items processed by AP and currently outstanding to be paid are OIG/UAP adjustments.

Detail by invoice and PO# attached.

Row Labels	Sum of APP-TRAN-PMT-AMT-6	
8108421	\$ 329,242.27	~Regular
8108937	\$ 363,774.75	~Organs
(blank)		
Grand Total	\$ 693,017.02	

From: Figueroa, Andrew J
Sent: Thursday, April 14, 2016 12:55 PM
To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>; Clark, Hamilton W <hamilton.clark@jhsmiami.org>
Subject: RE: AP for trinity

PO #	Sum of Amount
8108421 (Regular)	\$ 41,535.05
8108937 (Organs)	\$ 186,492.84
Grand Total	\$ 228,027.89

-----Original Message-----

From: Contreras, Alejandro E
Sent: Thursday, April 14, 2016 12:52 PM
To: Figueroa, Andrew J <Andrew.Figueroa@jhsmiami.org>; Clark, Hamilton W <hamilton.clark@jhsmiami.org>
Subject: RE: AP for trinity

What is organ procurement versus regular transport

-----Original Message-----

From: Figueroa, Andrew J
Sent: Thursday, April 14, 2016 12:49 PM
To: Clark, Hamilton W <hamilton.clark@jhsmiami.org>; Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>

Subject: RE: AP for trinity

Here is everything processed for Trinity from FY15 and FY16 by cost code with PO info

-----Original Message-----

From: Clark, Hamilton W

Sent: Thursday, April 14, 2016 12:04 PM

To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>; Figueroa, Andrew J <Andrew.Figueroa@jhsmiami.org>

Subject: RE: AP for trinity

Andrew, can you add cost code to the query?

-----Original Message-----

From: Contreras, Alejandro E

Sent: Thursday, April 14, 2016 12:03 PM

To: Clark, Hamilton W

Subject: Re: AP for trinity

Do you know the ones for transplant

Sent from my iPhone

> On Apr 14, 2016, at 11:33 AM, Clark, Hamilton W <hamilton.clark@jhsmiami.org> wrote:

>

> Alex, please see attached. thanks,

>

> -----Original Message-----

> From: Figueroa, Andrew J

> Sent: Thursday, April 14, 2016 9:50 AM

> To: Clark, Hamilton W; Cabanas, Bianca

> Subject: RE: AP for trinity

>

> Everything paid from FY15 and FY16 to date

>

> There are 2 Contracts/PO's out there for Trinity: 1 for Organ Air Transport through Transplant and 1 for Ground Transport through Ernie Verdecia's department (I think it falls under Quality now)

>

> -----Original Message-----

> From: Clark, Hamilton W

> Sent: Thursday, April 14, 2016 9:42 AM

> To: Figueroa, Andrew J <Andrew.Figueroa@jhsmiami.org>; Cabanas, Bianca <bianca.cabanas@jhsmiami.org>

> Subject: AP for trinity

>

> Please pull and send me a listing of all paid invoices to trinity from FY15 and FY16. Excel is fine don't need the actual invoices. Asap would be great. Sorry and thanks!

>

>

> <AP270 - Trinity Air FY15 & FY16 through 041416.csv>

From: RCostanz@ihsmiami.org
To: Don.Steigman@ihsmiami.org; Alejandro.Contreras@ihsmiami.org
Subject: FW: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance
Date: Thursday, April 14, 2016 9:30:09 AM
Attachments: [JHS - Transport Procedure for Incoming Outgoing Patients for Jackson.msg](#)

This information relates to the call this morning. Please see attached. Let me know if you need me to communicate with Trinity to make a change to what they have outlined on the attached.

From: Costanzo, Rosa M
Sent: Tuesday, April 12, 2016 8:21 AM
To: Verdecia, Ernest; Fernandez, Luis
Cc: Contreras, Alejandro E
Subject: FW: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

FYI- this should help with payment review and approvals.

Thank you
Rosa

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance International
[\[IngerLisa@TrinityAirAmbulance.com\]](mailto:IngerLisa@TrinityAirAmbulance.com)
Sent: Monday, April 11, 2016 07:56 PM Eastern Standard Time
To: Contreras, Alejandro E
Cc: Costanzo, Rosa M; 'Maria P'
Subject: JHS Contract (RFP) 13-11355-CS: Transportation of Patients to Jackson // Trinity Air Ambulance

Good Evening Alejandro & Rosa

RE: Contract (RFP) 13-11355-CS

On Friday, February 12, 2016, we had a meeting and our Contract (RFP) 13-11355-CS - Air Ambulance Transportation was discussed.

On Thursday, February 18th, 2016, I sent an email to Alex & Maria (Trinity's office manager) advising Maria of what was discussed and agreed upon at our February 12th meeting. I provided her with the Transport Procedure for Incoming & Outgoing Patients for Jackson (see attached). The next day, Trinity commenced transportation using our Contract and Rates. The procedure as follows:

1. Incoming patients, Trinity will obtain "Financial Clearance" & Acceptance from the Jackson International or Jackson Domestic Department, and then Trinity will transport and then bill Jackson
2. Outgoing patients, Trinity will confirm health insurance coverage (for Subrogation purposes) and then Trinity will transport and then bill Jackson

Since February 18th, a total of 20 new patients have been brought to

Jackson. Most if not all, have been of high acuity, requiring ICU stays. These patients could have been accepted at other facilities.

On each and every case, Trinity obtained from the International Department (and I believe one from the Domestic Department) Financial & Medical Clearances (we have copies of emails from the International Department these "clearances" for each transfer). For cases that could not be financially cleared, we have had to transport to other facilities. Maria then sent invoices, per the Contracted rates, to Ernie, who acknowledged each one. He has requested confirmation of with whom at the Jackson International Department who provided the clearance - and we provided that information to him. He then replied to Maria that he had "approved" the invoice, for each one.

The process appeared to be flowing well so I am not sure what the hold-up is on the payments for the invoices. Can you let us know when we should expect payment. We would like to continue to refer patients to Jackson, since JHS can handle all cases & the outcomes have been positive.

In addition, I have spoken with Rosa with regards to other clients that I believe collaboratively we could approach and present Jackson as the primary care provider. Let me know when you both can meet to further discuss.

Thank you,

Inger Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
3535 Galt Ocean Drive
Fort Lauderdale, Florida 33308
Ph: 954-771-7911
Cell: 305-205-0570
Fax: 954-771-4882

Email: IngerLisa@TrinityAirAmbulance.com
Website: www.TrinityAirAmbulance.com

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-----Original Message-----

From: Contreras, Alejandro E [<mailto:Alejandro.Contreras@jhs-miami.org>]
Sent: Friday, April 08, 2016 5:19 PM
To: Verdecia, Ernest; 'maria@trinityairambulance.com'; Corrales, Diamela
Cc: Costanzo, Rosa M; 'ingerlisa@trinityairambulance.com'
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air

Ambulance

Ernie/Diamela- We need check if patients had insurance and provide this information. If insurance does not pay we need to. Insurance info must be provided so they can bill if they can get pay

-----Original Message-----

From: Verdecia, Ernest

Sent: Friday, April 8, 2016 4:35 PM

To: 'maria@trinityairambulance.com' <maria@trinityairambulance.com>; Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>

Cc: Costanzo, Rosa M <RCostanz@jhsmiami.org>;

'ingerlisa@trinityairambulance.com' <ingerlisa@trinityairambulance.com>

Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Maria

Yes I understand but these are international patients, after I checked with international they advised when a patient is brought into our facility you are to bill patients insurance

Since this is not my normal scope of service I turfed them to international for final approval and that's what was advised yes I gave the initial approval but its up to them for final approval since its their patient

Sorry for the confusion please call me Monday to discuss

Ernie

----- Original Message -----

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]

Sent: Friday, April 08, 2016 04:12 PM

To: Verdecia, Ernest

Cc: Costanzo, Rosa M; 'Inger Lisa Skroder, MN, ARNP - Trinity Air Ambulance' <ingerlisa@trinityairambulance.com>

Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Thanks for your reply Ernie

I am a little confused. We were advised by Mr. Alejandro Contreras to send invoices to you and you were to send for processing. And when I emailed you the invoices (and 99% are International), you have reviewed them and replied, for example:

1. For date of service January 28, 2016, patient [REDACTED] you wrote back "Approved!! We will process through our system asap" (see attached email "RE: [REDACTED] - Invoice....").
2. For date of service February 19, 2016, patient [REDACTED] you wrote back " Approved ! Please process asap ! Thanks" (see attached email "RE: [REDACTED] - Invoice...") and you included ghxodap.jacksonhealthsystems@na.firstsource.com)
3. For date of service March 17, 2016, patient [REDACTED] you wrote back "received thanks" (see attached email "RE: [REDACTED] ..").

Thank you in advance for the clarification of the process. We wish not to have any further delays.

Please provide an update on each of the 22 outstanding invoices as to the status of payment.

Maria

-----Original Message-----

From: Verdecia, Ernest [<mailto:Ernest.Verdecia@jhs-miami.org>]
Sent: Friday, April 08, 2016 4:00 PM
To: 'maria@trinityairambulance.com'
Cc: Costanzo, Rosa M
Subject: Re: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Maria,

I've received your invoices, however most of the patients are incoming international patients. I've forwarded these invoices to Elvia from our International department for review.

I am available Monday morning to discuss further and may possibly have an update from Elvia, please feel free to call me then.

Thanks
Ernie

----- Original Message -----

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Friday, April 08, 2016 03:00 PM
To: Verdecia, Ernest
Cc: Costanzo, Rosa M; maria@trinityairambulance.com
<maria@trinityairambulance.com>
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

I am following up to ensure you received my email with regards to the 22 invoices.

Can you let me know what the status is on each ?

Maria

-----Original Message-----

From: Trinity Air Ambulance - Maria [<mailto:maria@trinityairambulance.com>]
Sent: Thursday, April 07, 2016 11:59 AM
To: 'Verdecia, Ernest'
Cc: Costanzo, Rosa M; maria@trinityairambulance.com
Subject: RE: JHS invoices - 22 Air Ambulance Invoices // Trinity Air Ambulance

Hi Ernie

Thank you for your email. As requested please find the list of twenty two (22) invoices. I have included the following: date of service, patient name, invoice number and amount due.

Please advise payment status for each.

1. October 17, 2015	[REDACTED]	15JHS1017YB	\$19,920.00
2. January 28, 2016	[REDACTED]	16JHS0128KS	\$10,000.00
3. February 19, 2016	[REDACTED]	16JHS0219BH	\$17,254.88
4. February 22, 2016	[REDACTED]	16JHS0222WM	\$15,134.40
5. February 23, 2016	[REDACTED]	16JHS0223MZ	\$15,134.40
6. February 27, 2016	[REDACTED]	16JHS0226GB	\$10,089.00
7. February 28, 2016	[REDACTED]	16JHS0228LS	\$7,185.20
8. March 4, 2016	[REDACTED]	16JHS0303AR	\$25,055.00
9. March 7, 2016	[REDACTED]	16JHS0307GD	\$17,272.50
10. March 8, 2016	[REDACTED]	16JHS0308DG	\$16,922.50
11. March 8, 2016	[REDACTED]	16JHS0308SS	\$16,922.50
12. March 10, 2016	[REDACTED]	16JHS0310CK	\$16,772.60
13. March 11, 2016	[REDACTED]	16JHS0311KC	\$8,740.50
14. March 11, 2016	[REDACTED]	16JHS0311DB	\$15,682.10
15. March 11, 2016	[REDACTED]	16JHS0311JB	\$8,673.38
16. March 14, 2016	[REDACTED]	16JHS0314VP	\$17,159.10
17. March 17, 2016	[REDACTED]	16JHS0317PA	\$10,675.00
18. March 17, 2016	[REDACTED]	16JHS0317AA	\$17,632.00
19. March 27, 2016	[REDACTED]	16JHS0327FV	\$6,742.80
20. March 27, 2016	[REDACTED]	16JHS0327SQ	\$30,904.50
21. March 28, 2016	[REDACTED]	16JHS0328NM	\$20,201.00
22. March 29, 2016	[REDACTED]	16JHS0329MS	\$15,999.00

Maria

-----Original Message-----

From: Verdecia, Ernest [<mailto:Ernest.Verdecia@jhs-miami.org>]

Sent: Tuesday, April 05, 2016 2:16 PM

To: Inger Lisa Skroder - Trinity Air Ambulance

Cc: Maria P

Subject: RE: JHS invoices

Hi Maria and Lisa,

Please send me all invoices you have pending of patients you have brought into any Jackson facility in the past 60 days

Thanks

Ernie

-----Original Message-----

From: Inger Lisa Skroder - Trinity Air Ambulance

[<mailto:IngerLisa@TrinityAirAmbulance.com>]

Sent: Saturday, April 02, 2016 11:43 AM
To: Verdecia, Ernest
Cc: Maria P
Subject: JHS invoices

Hi Ernie

Nice speaking with you today.

On another note, can you find out what the status is of our invoices as we have not received payment for some time.

Can we have a conference call on Thursday, April 7th to discuss the status or if you could email Maria the list - thanks !

Have a nice weekend

Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

From: Alejandro.Contreras@jhsmiami.org
Sent: Friday, April 15, 2016 3:26 PM
To: IngerLisa@TrinityAirAmbulance.com
Cc: Ernest.Verdecia@jhsmiami.org; Diamela.Corrales@jhsmiami.org
Subject: Inbound/Outbound

Importance: High

Please be advised that Jackson Health System will only be responsible for outbound flights from our facilities , as approved by our transportation departments

Alex Contreras-Soto
Senior Vice President, Operations
305-585-4073 Office
305-632-7751 Cell

From: Inger Lisa Skroder - Trinity Air Ambulance <IngerLisa@TrinityAirAmbulance.com>
Sent: Friday, April 15, 2016 3:45 PM
To: Rosa M Costanzo
Cc: Maria P
Subject: Fwd: Inbound/Outbound

Rosa

Will there be an amendment to the contract now ?

Inger-Lisa Skroder, MN, ARNP
Trinity Air Ambulance International
Office: 954-771-7911
Mobile: 305-205-0570

Begin forwarded message:

From: "Contreras, Alejandro E" <Alejandro.Contreras@jhsmiami.org>
Date: April 15, 2016 at 15:25:43 EDT
To: 'Inger Lisa Skroder - Trinity Air Ambulance' <IngerLisa@TrinityAirAmbulance.com>
Cc: "Verdecia, Ernest" <Ernest.Verdecia@jhsmiami.org>, "Corrales, Diamela" <Diamela.Corrales@jhsmiami.org>
Subject: Inbound/Outbound

Please be advised that Jackson Health System will only be responsible for outbound flights from our facilities , as approved by our transportation departments

Alex Contreras-Soto
Senior Vice President, Operations
305-585-4073 Office
305-632-7751 Cell

From: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Sent: Friday, April 15, 2016 7:53 AM
To: Figueroa, Andrew J; Clark, Hamilton W
Subject: RE: AP for trinity

Can you check on system and see the levels of approval. You indicated I approve some, can you tell me the levels prior to me

From: Figueroa, Andrew J
Sent: Thursday, April 14, 2016 2:00 PM
To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>; Clark, Hamilton W <hamilton.clark@jhsmiami.org>
Subject: RE: AP for trinity

Attached is everything that has been paid by AP for FY15 and FY16 through 4/14/16. The only items processed by AP and currently outstanding to be paid are OIG/UAP adjustments.

Detail by invoice and PO# attached.

Row Labels	Sum of APP-TRAN-PMT-AMT-6	
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8108937	\$ 363,774.75	~Organs
(blank)		
Grand Total	\$ 693,017.02	

From: Figueroa, Andrew J
Sent: Thursday, April 14, 2016 12:55 PM
To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>; Clark, Hamilton W <hamilton.clark@jhsmiami.org>
Subject: RE: AP for trinity

PO #	Sum of Amount
8108421 (Regular)	\$ 41,535.05
8108937 (Organs)	\$ 186,492.84
Grand Total	\$ 228,027.89

-----Original Message-----

From: Contreras, Alejandro E
Sent: Thursday, April 14, 2016 12:52 PM
To: Figueroa, Andrew J <Andrew.Figueroa@jhsmiami.org>; Clark, Hamilton W <hamilton.clark@jhsmiami.org>
Subject: RE: AP for trinity

What is organ procurement versus regular transport

-----Original Message-----

From: Figueroa, Andrew J
Sent: Thursday, April 14, 2016 12:49 PM

To: Clark, Hamilton W <hamilton.clark@jhsmiami.org>; Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Subject: RE: AP for trinity

Here is everything processed for Trinity from FY15 and FY16 by cost code with PO info

-----Original Message-----

From: Clark, Hamilton W

Sent: Thursday, April 14, 2016 12:04 PM

To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>; Figueroa, Andrew J <Andrew.Figueroa@jhsmiami.org>

Subject: RE: AP for trinity

Andrew, can you add cost code to the query?

-----Original Message-----

From: Contreras, Alejandro E

Sent: Thursday, April 14, 2016 12:03 PM

To: Clark, Hamilton W

Subject: Re: AP for trinity

Do you know the ones for transplant

Sent from my iPhone

> On Apr 14, 2016, at 11:33 AM, Clark, Hamilton W <hamilton.clark@jhsmiami.org> wrote:

>

> Alex, please see attached. thanks,

>

> -----Original Message-----

> From: Figueroa, Andrew J

> Sent: Thursday, April 14, 2016 9:50 AM

> To: Clark, Hamilton W; Cabanas, Bianca

> Subject: RE: AP for trinity

>

> Everything paid from FY15 and FY16 to date

>

> There are 2 Contracts/PO's out there for Trinity: 1 for Organ Air Transport through Transplant and 1 for Ground Transport through Ernie Verdecia's department (I think it falls under Quality now)

>

> -----Original Message-----

> From: Clark, Hamilton W

> Sent: Thursday, April 14, 2016 9:42 AM

> To: Figueroa, Andrew J <Andrew.Figueroa@jhsmiami.org>; Cabanas, Bianca <bianca.cabanas@jhsmiami.org>

> Subject: AP for trinity

>

> Please pull and send me a listing of all paid invoices to trinity from FY15 and FY16. Excel is fine don't need the actual invoices. Asap would be great. Sorry and thanks!

>

>

> <AP270 - Trinity Air FY15 & FY16 through 041416.csv>

From: Scull, Carlos <CScull@jhsmiami.org>
Sent: Friday, April 15, 2016 9:22 AM
To: Costanzo, Rosa M
Subject: RE: Clarification needed
Attachments: RFP 13-11355_Air Ambulance Services.doc

Hi Rosa,

I'm running to my meetings but please see these sections:

Section 2.1 - General Information: "The purpose of this solicitation is to establish a contract for Air Ambulance Services that will be used to transport patients from and to different locations in North America, South America and the Caribbean. The successful Proposer will provide superior medical care in respect of emergency evacuations and repatriation of JMH patients, efficiently and cost effectively, and pre-flight assessment and ground transportation."

One of the RFP requirements (Section 2.4.D - Reporting) is the commitment to provide a sample report on trips completed including data such as: flight hours, date, case number, pick-up / drop-off locations, patient diagnosis, cost, etc.

I hope this is helpful. Have a good day.

Carlos R. Scull, CPPB
Senior Procurement Contracting Officer for Goods & Services PHT/JHS Procurement Management Jackson Medical Tower
Ph: 305-585-6781
Fax: 305-355-6719
cscull@jhsmiami.org

-----Original Message-----

From: Costanzo, Rosa M
Sent: Friday, April 15, 2016 7:57 AM
To: Scull, Carlos
Subject: Clarification needed

Please check our air ambulance contract and let me know if it's for both incoming and outgoing air ambulance services. I need the language that confirms that in the contract. Thank you

From: Andrew.Figueroa@jhsmiami.org
Sent: Friday, April 15, 2016 9:06 AM
To: Alejandro.Contreras@jhsmiami.org; hamilton.clark@jhsmiami.org
Subject: RE: AP for trinity

I just spoke to Vicky of AP. She confirms that only 1 level of approval is required for PO-driven invoices under \$1M.

From: Figueroa, Andrew J
Sent: Friday, April 15, 2016 8:30 AM
To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>; Clark, Hamilton W <hamilton.clark@jhsmiami.org>
Subject: RE: AP for trinity

I'll ask AP

Sent with Good (www.good.com)

-----Original Message-----

From: Contreras, Alejandro E
Sent: Friday, April 15, 2016 07:52 AM Eastern Standard Time
To: Figueroa, Andrew J; Clark, Hamilton W
Subject: RE: AP for trinity

Can you check on system and see the levels of approval. You indicated I approve some, can you tell me the levels prior to me

From: Figueroa, Andrew J
Sent: Thursday, April 14, 2016 2:00 PM
To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>; Clark, Hamilton W <hamilton.clark@jhsmiami.org>
Subject: RE: AP for trinity

Attached is everything that has been paid by AP for FY15 and FY16 through 4/14/16. The only items processed by AP and currently outstanding to be paid are OIG/UAP adjustments.

Detail by invoice and PO# attached.

Row Labels	Sum of APP-TRAN-PMT-AMT-6	
8108421	\$ 329,242.27	~Regular
8108937	\$ 363,774.75	~Organs
(blank)		
Grand Total	\$ 693,017.02	

From: Andrew.Figueroa@jhsmiami.org
Sent: Friday, April 15, 2016 9:06 AM
To: Alejandro.Contreras@jhsmiami.org; hamilton.clark@jhsmiami.org
Subject: RE: AP for trinity

I just spoke to Vicky of AP. She confirms that only 1 level of approval is required for PO-driven invoices under \$1M.

From: Figueroa, Andrew J
Sent: Friday, April 15, 2016 8:30 AM
To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>; Clark, Hamilton W <hamilton.clark@jhsmiami.org>
Subject: RE: AP for trinity

I'll ask AP

Sent with Good (www.good.com)

-----Original Message-----

From: Contreras, Alejandro E
Sent: Friday, April 15, 2016 07:52 AM Eastern Standard Time
To: Figueroa, Andrew J; Clark, Hamilton W
Subject: RE: AP for trinity

Can you check on system and see the levels of approval. You indicated I approve some, can you tell me the levels prior to me

From: Figueroa, Andrew J
Sent: Thursday, April 14, 2016 2:00 PM
To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>; Clark, Hamilton W <hamilton.clark@jhsmiami.org>
Subject: RE: AP for trinity

Attached is everything that has been paid by AP for FY15 and FY16 through 4/14/16. The only items processed by AP and currently outstanding to be paid are OIG/UAP adjustments.

Detail by invoice and PO# attached.

Row Labels	Sum of APP-TRAN-PMT-AMT-6	
8108421	\$ 329,242.27	~Regular
8108937	\$ 363,774.75	~Organs
(blank)		
Grand Total	\$ 693,017.02	

From: Figueroa, Andrew J
Sent: Thursday, April 14, 2016 12:55 PM
To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>; Clark, Hamilton W <hamilton.clark@jhsmiami.org>
Subject: RE: AP for trinity

PO #	Sum of Amount
8108421 (Regular)	\$ 41,535.05
8108937 (Organs)	\$ 186,492.84
Grand Total	\$ 228,027.89

-----Original Message-----

From: Contreras, Alejandro E
Sent: Thursday, April 14, 2016 12:52 PM
To: Figueroa, Andrew J <Andrew.Figueroa@jhsmiami.org>; Clark, Hamilton W <hamilton.clark@jhsmiami.org>
Subject: RE: AP for trinity

What is organ procurement versus regular transport

-----Original Message-----

From: Figueroa, Andrew J
Sent: Thursday, April 14, 2016 12:49 PM
To: Clark, Hamilton W <hamilton.clark@jhsmiami.org>; Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>
Subject: RE: AP for trinity

Here is everything processed for Trinity from FY15 and FY16 by cost code with PO info

-----Original Message-----

From: Clark, Hamilton W
Sent: Thursday, April 14, 2016 12:04 PM
To: Contreras, Alejandro E <Alejandro.Contreras@jhsmiami.org>; Figueroa, Andrew J <Andrew.Figueroa@jhsmiami.org>
Subject: RE: AP for trinity

Andrew, can you add cost code to the query?

-----Original Message-----

From: Contreras, Alejandro E
Sent: Thursday, April 14, 2016 12:03 PM
To: Clark, Hamilton W
Subject: Re: AP for trinity

Do you know the ones for transplant

Sent from my iPhone

> On Apr 14, 2016, at 11:33 AM, Clark, Hamilton W <hamilton.clark@jhsmiami.org> wrote:

>

> Alex, please see attached. thanks,

>

> -----Original Message-----

> From: Figueroa, Andrew J

> Sent: Thursday, April 14, 2016 9:50 AM

> To: Clark, Hamilton W; Cabanas, Bianca
> Subject: RE: AP for trinity
>
> Everything paid from FY15 and FY16 to date
>
> There are 2 Contracts/PO's out there for Trinity: 1 for Organ Air Transport through Transplant and 1 for Ground Transport through Ernie Verdecia's department (I think it falls under Quality now)
>
> -----Original Message-----
> From: Clark, Hamilton W
> Sent: Thursday, April 14, 2016 9:42 AM
> To: Figueroa, Andrew J <Andrew.Figueroa@jhsmiami.org>; Cabanas, Bianca <bianca.cabanas@jhsmiami.org>.
> Subject: AP for trinity
>
> Please pull and send me a listing of all paid invoices to trinity from FY15 and FY16. Excel is fine don't need the actual invoices. Asap would be great. Sorry and thanks!
>
>
> <AP270 - Trinity Air FY15 & FY16 through 041416.csv>

Ordonez, Raul G

From: Ordonez, Raul G
Sent: Thursday, September 14, 2017 5:21 PM
To: Knight, Mark T (Mark.Knight@jhsmiami.org)
Cc: Ringholz, Judy
Subject: Accounts

Hi Mark,

Please find the accounts below as discussed. Please let me know if there is any additional information you need.

July 2015

[REDACTED] MRN-4723807 FIN-40011003005

February-April 2015

[REDACTED] MRN-4807862 FIN-40011997265

[REDACTED] MRN-4807969- FIN-40011999026-

[REDACTED] MRN-2290298 FIN-40012036128

[REDACTED] MRN-4804710- FIN-40011956515

[REDACTED] MRN-4800165 FIN-40011901145

[REDACTED] MRN-4803930 FIN-40011949019

[REDACTED] MRN-4811499 FIN-400120441014

[REDACTED] MRN-4810855 FIN- 40012031059

[REDACTED] MRN-48102173 FIN-40011924038

[REDACTED] MR- 4805959 FIN 40011974315

Regards,

Raul G. Ordonez, III
Director, Compliance
Office of Compliance and Ethics

Jackson Memorial Hospital
1611 NW 12th Avenue
West Wing 105E
Miami, Florida 33136-1096
Phone: 305-585- 4443
Fax: 305-585-6144
raul.ordonez@jhsmiami.org

Knight, Mark T

From: Knight, Mark T
Sent: Friday, September 22, 2017 11:02 AM
To: Torres, Myriam
Cc: Ringholz, Judy
Subject: FW: Possible Refunds 09202017.xlsx
Attachments: Possible Refunds 09202017.xlsx

Myriam –

Please move forward with refunding only the federal payors in this file.

And confirm once complete.

Thanks.....Mark

From: Torres, Myriam
Sent: Wednesday, September 20, 2017 4:14 PM
To: Knight, Mark T <Mark.Knight@jhsmiami.org>
Subject: Possible Refunds 09202017.xlsx

Here is the detail of the 11 accounts with a summary by insurance plan. Let me know by when we should issue the refunds.

Knight, Mark T

From: Knight, Mark T
Sent: Friday, September 22, 2017 11:02 AM
To: Torres, Myriam
Cc: Ringholz, Judy
Subject: FW: Possible Refunds 09202017.xlsx
Attachments: Possible Refunds 09202017.xlsx

Myriam –

Please move forward with refunding only the federal payors in this file.

And confirm once complete.

Thanks.....Mark

From: Torres, Myriam
Sent: Wednesday, September 20, 2017 4:14 PM
To: Knight, Mark T <Mark.Knight@jhsmiami.org>
Subject: Possible Refunds 09202017.xlsx

Here is the detail of the 11 accounts with a summary by insurance plan. Let me know by when we should issue the refunds.

From: Knight, Mark T <Mark.Knight@jhsmiami.org>
Sent: Wednesday, December 5, 2018 5:06 PM
To: Kennedy, James (OIG)
Cc: Murphy, Terry (OIG)
Subject: RE: Trinity Air - Invoice 16JHS0402VK

This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected emails. Please click here if this is a suspicious message reportspam@miamidade.gov **Enterprise Security Office**

Jim –

I just attempted to reach you again via phone.

We are unable to produce the back up on the payment authorization on this invoice, consistent with your communication with Laura Scott, Accounts Payable Director.

Let me know if I can provide any additional information.

Regards.....Mark

Mark Knight
Executive Vice President & Chief Financial Officer

Jackson Health System
1611 NW 12th Avenue
South Wing 117
Miami, FL 33136
Office: 305-585-4211
mark.knight@jhsmiami.org

From: Kennedy, James (OIG) [mailto:James.Kennedy@miamidade.gov]
Sent: Tuesday, December 04, 2018 11:32 AM
To: Knight, Mark T <Mark.Knight@jhsmiami.org>
Cc: Murphy, Terry (OIG) <Terence.Murphy@miamidade.gov>
Subject: Trinity Air - Invoice 16JHS0402VK

WARNING: This email originated outside of Jackson Health System. Do not click links or attachments unless you recognize the sender and know the content is safe.

Good morning Mr. Knight,

In order to close the review of the Trinity Air matter, the OIG needs the documentation of the approval process for a Trinity invoice (16JHS0402VK) that was paid by JHS on November 11, 2016 via Check # 2004003. [Attached].

There is no record in the electronic Lawson system of an approval recorded for this invoice. On the contrary, the Lawson system shows the invoice was previously reviewed on two occasions and rejected, on June 30, 2016 and October 31, 2016. [Attached]

Our office has been in communication with Laura Scott of Accounts Payable and Ernest Verdecia of Transportation. To date, no one has been able to provide the approval documentation relied upon to process this payment. We trust you will be able to produce the record we are seeking. If there is no documentation of an approval, please let us know who verbally instructed that the payment be processed.

Let me know if you have any questions.

Sincerely,

James Kennedy

Special Agent

Office of the Inspector General

601 NW 1st Court

22nd Floor, South Tower

Miami, Florida 33136

Main Line: (305) 375-1946

Direct Line: (305) 350-0651

Fax Line: (305) 579-9775

Visit Our Website at: www.miamidadeig.org

From: Inger Lisa Skroder - Trinity Air Ambulance <ingerlisa@trinityairambulance.com>
Sent: Friday, December 7, 2018 5:19 PM
To: Murphy, Terry (OIG)
Cc: Kennedy, James (OIG)
Subject: RE: Status of Invoices / July 13, 2016 letter

This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected emails. Please click here if this is a suspicious message reportspam@miamidade.gov **Enterprise Security Office**

Hi Terry

As you Tor and I are traveling for the tv show tomorrow & back Monday. I will follow up you then
Have a great weekend
Inger lisa

From: Murphy, Terry (OIG) <Terence.Murphy@miamidade.gov>
Sent: Friday, December 07, 2018 5:14 PM
To: Inger Lisa Skroder - Trinity Air Ambulance <ingerlisa@trinityairambulance.com>
Cc: Kennedy, James (OIG) <James.Kennedy@miamidade.gov>
Subject: RE: Status of Invoices / July 13, 2016 letter

Thanks, Inger Lisa.

That's very helpful. We were unable to determine if a payment had been made on the [REDACTED] transport. And, we did find a payment amount that matched the [REDACTED] invoice, but the transaction was almost six months after the due date. Your records now confirm what we found in the JHS files.

When you and Tor are available, we would like get your recollection of the communications with your contacts at JHS about these two invoices. Please let us know when would be a convenient time to meet.

Have a good weekend.

Terry

From: Inger Lisa Skroder - Trinity Air Ambulance [<mailto:ingerlisa@trinityairambulance.com>]
Sent: Friday, December 07, 2018 4:46 PM
To: Murphy, Terry (OIG) <Terence.Murphy@miamidade.gov>
Cc: Inger Lisa Skroder - Trinity Air Ambulance <ingerlisa@trinityairambulance.com>
Subject: RE: Status of Invoices / July 13, 2016 letter

This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected emails. Please click here if this is a suspicious message reportspam@miamidade.gov **Enterprise Security Office**

Terry

1. [REDACTED] – no payment from Jackson
2. [REDACTED] - JMH paid \$ 10,425.63 -payment received November 14, 2016

I will double check Tuesday when I return from travel

Inger Lisa

From: Murphy, Terry (OIG) <Terence.Murphy@miamidade.gov>
Sent: Friday, December 07, 2018 3:51 PM
To: Inger Lisa Skroder - Trinity Air Ambulance <ingerlisa@trinityairambulance.com>
Cc: Kennedy, James (OIG) <James.Kennedy@miamidade.gov>
Subject: Status of Invoices / July 13, 2016 letter

Hello Inger Lisa,

Thanks for your call yesterday. Were you able to check the status of those two (2) invoices referenced in that letter?

Terry Murphy

**Miami-Dade County
Office of the Inspector General**

Appendix B

JHS Response to OIG Draft Report

OIG Case No. 18-0005-O

January 10, 2019

Mary Cagle, Esq.
Inspector General, Miami-Dade County
Office of the Inspector General
601 NW 1st Court
Transit Village South Tower, 22nd Floor
Miami, Florida 33136

RE: Response to Miami-Dade County Office of Inspector General Draft Report Regarding
Review of Jackson Health System Payments to Trinity Air Ambulance International, LLC,
for Contractual Services / Patient Referrals

Dear Ms. Cagle,

On behalf of Jackson Health System (Jackson or JHS) and the JHS Office of Compliance and Ethics (OCE), I would like to thank the Miami-Dade County Office of Inspector General (OIG) for allowing us the opportunity to respond to the OIG's Draft Report Regarding Review of Jackson Health System Payments to Trinity Air Ambulance International, LLC (Trinity), for Contractual Services / Patient Referrals (OIG Draft Report). Based on the findings of its review, the OIG made three recommendations. I will address each of those recommendations in this response.

The OIG's first recommendation is that JHS and OCE reconsider disclosing the Trinity proposal, inbound transports, and payments to HHS-OIG. On its website, HHS-OIG advises that health care providers can use the Provider Self-Disclosure Protocol (SDP) to voluntarily disclose self-discovered evidence of potential fraud. In his open letter to health care providers, Inspector General Levinson advised that his office would accept providers into the SDP when the disclosed conduct involves colorable violations of the anti-kickback statute. Since the time that you and members of your team met with me and other senior leaders at Jackson in November to discuss the findings of the OIG's investigation, Jackson engaged an independent third party to conduct a thorough and comprehensive investigation and review of this matter. The independent reviewers found that, because there is not sufficient evidence of a kickback arrangement, liability would not be triggered under the Anti-Kickback Statute, the Civil Monetary Penalties Law, or the False Claims Act. Based upon these findings and conclusions, we respectfully maintain that self-disclosure to HHS-OIG is not warranted, nor would it be appropriate.

The OIG's second recommendation is that Jackson provide and document training to its staff, including senior management and department directors, on the Anti-Kickback Statute, the Civil Monetary Penalties Law, and other federal regulations to ensure compliance with legal requirements. The JHS Office of Compliance and Ethics conducts and documents general and specific (i.e., focused) compliance training on a regular basis. Prior to their first day on the job, all JHS workforce members are required to complete

training modules that cover these topics in our internal educational portal known as JEN. Upon beginning their employment, they are required to attend a live session conducted by a JHS compliance officer in which this training is reinforced; and, throughout the course of their employment, all JHS workforce members are required to complete compliance training that covers these topics on an annual basis in JEN.

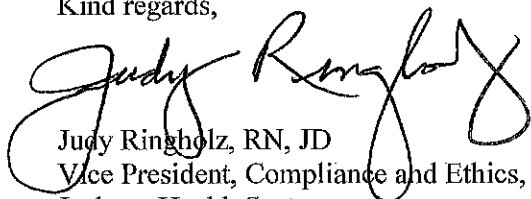
As a supplement to this training, I provided 90-minutes of required compliance training that included these topics for 97 of the most senior members of Jackson's leadership team. In 2019, the OCE began planning a presentation that is being specifically designed to educate key workforce members on relevant issues that they need to be aware of related to interactions with referral sources. This training will be scheduled in 2020.

The OIG's third and final recommendation is to establish a procedure to ensure that vendor initiatives and proposals are vetted, and due diligence, such as communicating with user departmental directors to determine any potential issues or pitfalls, is conducted prior to acting on such proposals. Procedures are and have been in place for ensuring this, and reinforcement will be included in the training described above that is planned for this year. Moreover, since 2019, Jackson's Procurement team implemented an enhancement to the RFP process whereby the OCE is included in selection committee meetings for proposals that involve referral sources. We are working on formalizing this process and, in 2020, the process will be incorporated into a system policy.

Jackson Health System and, in particular, the Office of Compliance and Ethics, enthusiastically supports and appreciates the Miami-Dade County OIG's mission to prevent fraud, waste, and abuse, as it is akin to our own mission, and we are pleased to know that the OIG perceives that Jackson cooperated fully with its investigation.

Please feel free to contact me directly if I can be of further assistance. My direct line is (305) 585-2948.

Kind regards,



Judy Ringholz, RN, JD
Vice President, Compliance and Ethics, & Chief Compliance Officer
Jackson Health System

**Miami-Dade County
Office of the Inspector General**

Appendix C

HOOPER, LUNDY & BOOKMAN, P.C.

MEMORANDUM

dated January 3, 2020

OIG Case No. 18-0005-O

HOOPER, LUNDY & BOOKMAN, P.C.

MEMORANDUM

TO: Carlos A. Migoya, President and Chief
Executive Officer, Jackson Health System
Don S. Steigman, Executive Vice President and
Chief Operating Officer
Mark T. Knight, Executive Vice President and
Chief Financial Officer
Judy Ringholz, Chief Compliance Officer
Eugene Shy, Jr., Assistant County Attorney
Christopher Kokoruda, Assistant County
Attorney
Laura M. Llorente, Assistant County Attorney

FROM: David S. Schumacher

DATE: January 3, 2020

RE: Response to OIG Draft Report

Hooper, Lundy & Bookman (“HLB”) was retained by the Public Health Trust of Miami Dade County (“PHT”) to review a draft report prepared by the Miami Dade County Office of Inspector General (“OIG”) regarding certain payments made by the Jackson Health System (“JHS”) to Trinity Air Ambulance International, LLC (“Trinity”) in April 2016 (“OIG draft report”) and advise JHS regarding OIG’s conclusions.

I. Executive Summary

Throughout the winter of 2016, Trinity aggressively pushed JHS to amend a contract between the parties for air ambulance services. Trinity proposed amending the arrangement such that JHS would pay Trinity directly for each inbound transport of an international patient. Trinity began transporting international patients to JHS and invoicing the hospital system for the transports. Trinity repeatedly urged numerous JHS employees to pay the invoices, which were causing widespread confusion at the hospital. On April 11, 2016, Trinity informed a JHS employee that, unless its invoices were paid immediately, Trinity would cease transport of organs to the Miami Transplant Institute (“MTI”)—a matter of utmost importance to JHS. The JHS employee relayed this information to Alejandro Contreras-Soto, JHS Senior Vice President and Chief Administrative Officer. Receiving this information at the end of the day on his birthday, Mr. Contreras approved a number of Trinity invoices in haste, without reviewing them. Within days, Mr. Contreras realized his error, reported the matter to the Chief Operating Officer,

Carlos A. Migoya, et al.

January 3, 2020

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attempted to stop the payments, and informed Trinity that JHS could not pay for inbound transports. JHS requested that Trinity repay the mistakenly-approved invoices, but Trinity refused. Ultimately, JHS refunded all payments made for medical care provided to the Medicare patients who were transported to JHS by Trinity.

OIG conducted an investigation, resulting in the OIG draft report. The OIG makes a number of conclusions and assertions, including that JHS agreed to amend the contract, knowingly and willfully approved the invoices at issue, and that Mr. Contreras only attempted to stop payment after the COO was informed of the situation. We believe that the evidence points to different conclusions.

First, we do not believe that the contract between JHS and Trinity was amended, in a formal or colloquial sense. There is no evidence that Mr. Contreras agreed with or accepted Trinity's proposal, and, even if he did, an amendment to a contract procured by a Request for Proposal must go through a number of formal steps.

Second, we believe that the evidence reflects that, on the day in question, the Trinity invoices were approved erroneously, rather than "knowingly and willfully"—an important legal term of art discussed below. It appears that the invoices were approved based on a series of unfortunate events. Trinity was an extremely aggressive, manipulative vendor that pushed numerous JHS employees to approve the invoices. By threatening to halt organ transport, Trinity successfully bypassed the normal invoice review process, elevating the matter to the Chief Administrative Officer. The matter reached Mr. Contreras' desk late in the day on his birthday, and he approved the invoices in haste, without careful review. There is no evidence that he intended to pay Trinity for inbound transports. The communications leading up to April 11th indicate that Mr. Contreras did not believe that the contract had been amended, but, rather, that normal processes should be followed. Moreover, upon realizing his mistake, Mr. Contreras took steps to rectify the error.

Third, we cannot conclude, based on the evidence, that the parties entered into an arrangement that violated the federal Antikickback Statute ("AKS"). The AKS is violated if a party *knowingly and willfully* pays or receives remuneration that is intended to induce referrals for services paid by federal health care programs. "Knowingly and willfully" in this context means that the party understood that the conduct was illegal. The evidence does not support a conclusion that anyone from JHS intended to pay kickbacks to Trinity. There is no evidence that Mr. Contreras intended such a result, and the evidence indicates that he approved the Trinity invoices in error. While it appears that one JHS executive was open to the proposal, she stated that she did not recognize that the proposal potentially violated the law, and we credit her assertion. On the Trinity side, while there is no question that the vendor made the proposal to increase business, we cannot conclude, based on the evidence in the record, that Trinity understood that the proposal was unlawful. While one might expect that any health care provider

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January 3, 2020

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should have recognized that the proposal violated the AKS, Trinity was a small, unsophisticated vendor, and we do not have evidence that Trinity acted with the required state of mind to violate the law.

Finally, we disagree with OIG's insinuation that Mr. Contreras only attempted to stop the payments after the Chief Operating Officer learned about the situation. Within days of the invoice payments, Mr. Contreras attempted to stop the payments. It was Mr. Contreras who notified the COO about the payments. And Mr. Contreras promptly informed Trinity that JHS could not pay for inbound transports. Once he realized the mistake, Mr. Contreras acted appropriately.

While we don't believe that there was a legal violation, it seems clear that Mr. Contreras acted negligently in approving the Trinity invoices without sufficient review. Moreover, Mr. Contreras did not sufficiently inform Trinity that JHS was not accepting its proposal. Mr. Contreras stated that, in the initial meeting with Trinity, he informed them that the contract would not be amended. However, over the next three months, Trinity repeatedly pressed the proposal in meetings, phone calls, and emails to Mr. Contreras (and others). Some of these emails indicated that Trinity believed that JHS had agreed to the proposal. Mr. Contreras largely ignored these communications. Had Mr. Contreras responded more proactively to Trinity, this problem may have been avoided. Finally, we cannot reconcile some of Mr. Contreras' statements made regarding these events with the evidence. For instance, Mr. Contreras has stated repeatedly that, on the day in question, he reviewed one of the Trinity invoices sent to him, that it was for local, rather than international, transport, and that it seemed in order, so he approved all of the Trinity invoices. We have been unable to identify any transportation invoices sent to Mr. Contreras on April 11th except for the Trinity invoices for inbound transport of international patients.

Nevertheless, we do not believe that Mr. Contreras intended to approve the invoices in question or that the contract was ever amended. Trinity is primarily at fault for unilaterally sending patients to JHS, invoicing the hospital system without authority, and threatening to stop organ transports unless these invoices were paid.

OIG ultimately makes three recommendations, including that JHS and OCE reconsider disclosing this situation to HHS-OIG. We do not believe that disclosure to HHS-OIG is required under the law or appropriate based on the facts. A health care provider is only required to make a "self disclosure" to HHS-OIG if it believes, in its reasonable assessment, that it is a party to a matter that potentially violates federal law. Because we do not believe that there has been a violation of law, the self-disclosure protocol is not triggered. As noted above, JHS refunded all payments for health care services to the Medicare beneficiaries at issue. We do not believe that JHS was required under the law to repay these funds, but we understand why, out of an abundance of caution, JHS made this business decision.

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II. Introduction/Methodology

In connection with this review, we analyzed a number of materials, including the OIG draft report and associated appendix materials, including emails, invoices, and other records. We also analyzed materials prepared by the JHS Office of Compliance and Ethics (“OCE”) in connection with this incident. We interviewed the following individuals in connection with its investigation: Procurement Manager Fidel Alvarez, International Operations Supervisor Elvia Armengol, Vice President of Operations Alejandro “Alex” Contreras-Soto, Director of Procurement Rosa Costanzo, Director of International Business Diamela Corrales, Director of Operations Luis Fernandez, Senior Vice President for Business Development Laura Hunter, Accounts Payable Clerk Cedrina Murphy-Russe and Director of Transportation Ernest Verdecia.¹

III. Factual Background²

A. The RFP and the Trinity Contract

As one of the largest and most highly regarded hospital systems in the southeast, JHS occasionally requires the services of air ambulances to transport patients and body parts to and from its facilities. Air transport is frequently used to bring organs to the Miami Transplant Institute (“MTI”), which hosts more than 450 transplants each year.³ In addition, from time to time, if a patient who lives far outside the community has received extended treatment at JHS, or if the patient can be transitioned to a lower level of care, an air ambulance may be used to transport the patient to another facility. Finally, patients who suffer an injury abroad and request to be treated at JHS may require an air ambulance for transport.

In the fall of 2013, the PHT issued a request for proposals for air ambulance services (the “RFP”).⁴ According to the RFP:

The purpose of this solicitation is to establish a contract for Air Ambulance Services that will be used to transport patients from

¹ We also consulted a legal overview prepared previously by HLB attorney W. Bradley Tully, Esq.

² The OIG draft report contains an exhaustive review of the factual background in the JHS-Trinity matter. Only facts pertinent to JHS’ response are mentioned herein.

³ See <https://jacksonhealth.org/transplant/#gref>

⁴ See RFP No. 13-11355-CS.

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January 3, 2020

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and to different locations in North America, South America and the Caribbean. The successful Proposer will provide superior medical care in respect of emergency evacuations and repatriation of JMH patients, efficiently and cost effectively, and pre-flight assessment and ground transportation.⁵

On October 30, 2013, Trinity submitted materials to the PHT in response to the RFP. In April 2014, air ambulance contracts were awarded to two vendors: Trinity and Reva, Inc. For the first contract, related to organ transport services, Reva was the primary vendor and Trinity was the secondary vendor. For the second contract, related to air ambulance services apart from organ transport, Trinity was awarded the contract as the primary vendor, with Reva serving as the secondary vendor.⁶ According to Mr. Contreras, the distinction between primary and secondary vendor status is that, whenever air ambulance services were required for non-organ-transport services, Trinity was supposed to receive the first opportunity for transport, with Reva serving as a backup.⁷ The contract had a three-year term and was valued at \$1,018,571. The RFP provided that “[p]roposers must be familiar with and must be in compliance with all Federal, State and local laws, ordinances, codes, resolutions and implementing rules and regulations that may in any way affect the products or services offered.”⁸

B. Background on Trinity

To understand the events giving rise to the OIG draft report, some background on Trinity is in order. Trinity is a small, closely-held air ambulance company that was founded in 1999 by Inger Lisa Skroder, MN, ARNP, Tor Skroder, RN, and Michael J. King, MD, FACC, FACP.⁹

⁵ RFP, § 2.1.

⁶ The contract was signed by Trinity on January 25, 2014 and by officials from the PHT on March 20, 2014 and April 16, 2014. *See* Agreement Pursuant to PHT RFP No.: 13-11355-CS for Air Ambulance Services (“the contract”). According to minutes of the Public Health Trust Board of Trustees, the “Contract Date” for the contract was May 1, 2014. *See* PHT Board of Trustees Purchasing Report, June 12, 2014, found at https://www.jhsmiami.org/WebApps/publicDocs/docLib/PHT_BOT_Meetings_Prior/PHT_BOT_OneDayCommittee/2014-06-12%20-%20PHT%20BOT%20One-Day%20Committee%20Meetings%20Agendas.pdf, at 5. The Contract Date of the organ transport contract is listed as April 28, 2014. *See* PHT Board of Trustees Purchasing Report, May 15, 2014, found at https://www.jhsmiami.org/WebApps/publicDocs/docLib/PHT_BOT_Meetings_Prior/PHT_BOT_OneDayCommittee/2014-05-15%20-%20PHT%20BOT%20One-Day%20Committee%20Meetings%20Agendas.pdf, at 10.

⁷ Alejandro Contreras interview, 12/19/16 (“Contreras interview”). The roles were reversed for the organ transport contract: Reva was the primary vendor and Trinity was the secondary vendor. The organ transport contract is not at issue for the purposes of this memorandum.

⁸ RFP, § 1.20.

⁹ *See* <https://trinityairambulance.com/founding-members/>

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JHS personnel uniformly described Trinity as an extremely aggressive, difficult vendor. For instance, Mr. Verdecia has been familiar with Trinity for several years. Mr. Verdecia described Ms. Skroder as “very difficult to work with, very pushy, very demanding.” He recalled an incident where a pediatric patient was being transferred to Holtz Children’s Hospital, and Ms. Skroder called him mid-transport to demand credit card information to pay for the patient’s transport. According to Mr. Verdecia, “she would call me in the middle of the night for a credit card, I would say don’t talk to me about payment, I’m focused on getting the patient where they need to go. It was the middle of the night.”¹⁰

This view of Trinity was shared by key employees in JHS’s International Department. Ms. Corrales and Ms. Armegnol also described Trinity as extremely aggressive.¹¹ For instance, they shared an unconfirmed rumor that Trinity staff once hid at an airport while another air ambulance company prepared a patient for transport, and Trinity physically intercepted the patient and loaded them onto a Trinity aircraft when their competitors were not looking. Ms. Corrales described Ms. Skroder as “manipulative,” stating: “She has a way of trying to manipulate people, and I think she went over us, directly to Alex Contreras, on a lot of issues . . . She wants her way, now.” Ms. Corrales stated that, at industry conferences, Trinity aggressively attempts to speak with prospective clients who have declined meetings in the past. According to Ms. Corrales, “Every time I see Trinity, I’m scared.”¹²

Additional JHS executives and employees echoed these sentiments. Rosa Costanzo, Chief Procurement Officer, described Trinity as “very aggressive” and recalled contacts from Ms. Skroder “around the clock” to attempt to increase business from JHS.¹³ Cedrina Murphy-Russe, an Accounts Payable Clerk with responsibility for Trinity, described Trinity as “very difficult.” Ms. Murphy-Russe had many interactions with Ms. Skroder that were “always about getting paid . . . She just wanted to get paid, no matter what. The invoice could have just been submitted and she was already emailing saying, when will this get paid . . . I didn’t like dealing with her.” She also recalled that Ms. Skroder would threaten to stop transporting organs to JHS if Trinity’s invoices were not paid.¹⁴ This was corroborated by Mr. Alvarez.¹⁵

¹⁰ Ernest Verdecia interview, 12/16/19 (“Verdecia interview”).

¹¹ Diamela Corrales and Elvia Armengol interview, 12/16/19 (“Corrales and Armengol interview”).

¹² *Id.*

¹³ Rosa Costanzo interview, 12/16/19 (“Costanzo interview”).

¹⁴ Cedrina Murphy-Russe interview, 12/18/19 (“Murphy-Russe interview”).

¹⁵ Fidel Alvarez interview, 12/16/19 (“Alvarez interview”).

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Finally, Mr. Fernandez vividly recalled his interactions with Trinity:

I remember that they were a company that, in my many years of dealing with partners through RFPs, this was a company behaving in a way I had never seen before. They were illogical at times, they were argumentative almost all the time, they were haphazard in their written and verbal dialogue, and they were very insistent on getting invoices paid all the time. In that first 12-18 months, invoices were coming to Ernie, to transplant, to Alex, and we were trying to get a handle on why we were being billed and why this was happening. In that first 12-18 months, the flow of emails coming in with invoices and the manner that they were communicating with us was completely obtuse, and different to any normal business practice or communication that I had ever seen before.¹⁶

Mr. Fernandez recalled a bizarre visit to Trinity's headquarters in the spring of 2016. Mr. Fernandez was new to JHS at the time, having only joined in late 2015, and he scheduled the Trinity visit so that he could "better understand what kind of business they run," a practice he has utilized throughout his career whenever he is introduced to a new vendor. One of Trinity's owners "berated" Mr. Fernandez about not being paid on time and complained about other aspects of the JHS-Trinity relationship. Mr. Fernandez characterized the interaction as "the weirdest site visit I have had with a vendor in 30 years."¹⁷

C. Interactions with Trinity Prior to Approval of Invoices

By December 2015, Trinity was expressing its displeasure to JHS employees regarding the hospital's usage of Trinity's air ambulance services under the contract. On December 30, 2015, Ms. Skroder sent an email to Ms. Costanzo, complaining that JHS was "circumventing the system and hiring Reva instead of Trinity."¹⁸ Ms. Skroder requested a meeting and claimed that Trinity would be "seeking lost trip revenue."¹⁹ Around the same time, a separate Trinity employee sent another email complaining about Trinity's lack of usage under the contract, and requested a meeting:

¹⁶ Interview with Luis Fernandez, 12/18/19 ("Fernandez interview").

¹⁷ *Id.*

¹⁸ Email from Inger Lisa Skroder to Rosa Costanzo, 12/30/15.

¹⁹ *Id.*

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Our contract commenced April 15, 2014 and it was projected that there would be total of \$1,018,571.00 billed to Jackson under Purchase Order 8108421-0-SERV. To date it has been 21 months since inception of the contract and we have had only FIVE transport requests and the total billed to Jackson is \$76,899.16 . . . I can only assume that the balance of the air ambulance trips are being diverted to REVA!²⁰

Over the course of the next several months, Trinity repeatedly engaged with numerous JHS officials, suggesting a change to the JHS-Trinity contract in order to increase usage of Trinity for inbound transports.

Ms. Skroder first mentioned an amendment to the contract in an email to Ms. Costanzo on January 7, 2016. Ms. Skroder referenced a supposed arrangement between the Cleveland Clinic and an air carrier. Ms. Skroder recommended “an amendment” to “the current contract” so that “we (JHS & Trinity) would be able to bring more clients directly to the Jackson Health System.”²¹ Ms. Costanzo forwarded the email to Mr. Contreras, saying “[i]t may be worthwhile to meet with them.” Ms. Costanzo stated in an interview that her intent was to pass along information that a vendor brought to her attention to “get it off my desk.”²² Mr. Contreras immediately responded, saying “Yes we need to. Can you please.”²³ According to Mr. Contreras, he agreed to the meeting because he saw it as a “business opportunity in terms of growth development,” and he wanted to receive more information about what a competitor was doing. He “didn’t see any red flags at the time.”²⁴

The meeting occurred on January 21, 2016. Mr. Contreras recalled that the meeting took place in his office. He was surprised when Trinity aired a series of accusations about JHS. He recalled that Ms. Skroder complained that JHS was diverting patients to another air ambulance company and suggested that a JHS employee might be receiving kickbacks from the other company. Mr. Contreras further recalled that Ms. Skroder was “aggressive, abrupt and confrontational.” Later in the meeting, Ms. Skroder stated that Trinity had an arrangement with Broward Health Medical Center where Broward was paying Trinity for inbound air ambulance transports, and Ms. Skroder said, “we can do what we’re doing for Broward for JHS.”²⁵

²⁰ Email from Maria Pejdanovska to Rosa Costanzo, 1/5/16.

²¹ Email from Ms. Skroder to Ms. Costanzo, 1/7/16.

²² Interview with Rosa Costanzo (“Costanzo Interview”), 12/16/19.

²³ Email from Mr. Contreras to Ms. Costanzo, 1/7/16.

²⁴ Contreras interview.

²⁵ *Id.*

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Mr. Contreras insists that he never agreed to this proposal. As a threshold matter, Mr. Contreras stated that he recognized that the PHT maintained a strict process for amending any contract that was established via an RFP. Mr. Contreras understood that he did not have authority to unilaterally alter a contract. More fundamentally, Mr. Contreras stated that he understood the nature of what Ms. Skroder was proposing and he thought that the proposal “didn’t sound right.” Mr. Contreras said that he “clearly knew” that “what they were referring to was something that we couldn’t do as a health system. We couldn’t pay someone to bring us patients.” Therefore, Mr. Contreras recalls that, in response to Ms. Skroder’s proposal, he stated that “we will continue to follow our standard policies for transportation.”²⁶

Ms. Costanzo was the other JHS representative at this meeting. Ms. Costanzo corroborated that no one from JHS agreed to amend the contract. She recalls that Ms. Skroder aired numerous complaints about JHS during the meeting. Regarding the proposal to amend the contract, Ms. Costanzo recalls that there was a “brief discussion without any real detail to it. It went nowhere, there was no agreement.”²⁷

Notwithstanding JHS’s refusal to agree to the proposed arrangement, Ms. Skroder continued to press JHS personnel for changes to the contract during the meeting. On January 27, 2016, Ms. Skroder emailed Ms. Costanzo and described the potential venture in further detail. Ms. Skroder proposed an “addendum” to the RFP. Under the addendum, for any patient that Trinity transported to JHS, “Trinity will bill Jackson per contracted AA rate.” Ms. Skroder asked Ms. Costanzo to “take a look at it and we can discuss further.”²⁸ Mr. Contreras was not copied on this email.²⁹

A few days later, on February 1, 2016, Ms. Skroder emailed Ms. Costanzo and again described an arrangement with Broward Health, where the air ambulance company brought a patient to the hospital, Broward paid \$11,900 to the company, and the patient paid the balance (\$1,500). Ms. Skroder stated, “This is what we are proposing to Jackson. Trinity will receive calls for transport. We work up our contractual rate with Jackson and the balance the patient, family and/or client pays.”³⁰ Ms. Costanzo forwarded the email to Mr. Contreras, copying Ms.

²⁶ *Id.*

²⁷ Costanzo interview.

²⁸ Email from Ms. Skroder to Ms. Costanzo, 1/27/16.

²⁹ Ms. Costanzo forwarded this email to Mr. Contreras on February 10th; it is unclear why she forwarded the message on this date.

³⁰ Email from Ms. Skroder to Ms. Costanzo, 2/1/16. It is unclear if Ms. Skroder was representing that Broward had this arrangement with Trinity or another air ambulance provider. The subject of the email was, “JHS – transportation of patients // Broward General paying !”

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Skroder, stating “This is a quick follow up/example to the discussion we had with Trinity and the opportunity they have brought to our attention.” A few minutes later, Ms. Skroder emailed Mr. Contreras directly, as well as Ms. Costanzo, stating, “We have potential patients for Jackson,” describing a potential case, and stating: “If we can use our contracted JHS rate and bill the patient the remainder, we would be able to bring him to Jackson tomorrow. Firstly, we would send over his Medical Coverage information to Jackson for ‘Financial Clearance.’ What are your thoughts?”³¹

Mr. Contreras did not respond to this email. Mr. Contreras stated that the meeting with Trinity had left him with negative views towards Ms. Skroder and Trinity, and he “didn’t want to deal with them anymore.” Mr. Contreras also mentioned that he had many responsibilities besides transportation, and that responsibility for transportation was being transitioned at the time to Luis Fernandez.³²

While Mr. Contreras was put off by Ms. Skroder, he did believe that he should resolve one of Trinity’s complaints: that the secondary vendor, rather than Trinity, was receiving the “first crack” at non-organ air ambulance transports. It appears that some personnel at Jackson may have bypassed Trinity on transport requests based on difficulties dealing with the vendor, as described above. Mr. Contreras believed that this was inappropriate and that JHS had to follow the contract. He communicated with JHS personnel that the contract must be followed, and he even provided Ms. Skroder with his personal contact information, including his cell phone, in case the problem persisted.

Around this time, Trinity had scheduled another meeting on February 12, 2016 with Ms. Costanzo to discuss a number of items. Mr. Contreras explained in an email to Ms. Skroder that he had investigated Trinity’s complaints about the primary/secondary vendor issue and he was “confident that this will never happen again.” After Ms. Costanzo informed Mr. Contreras that Trinity staff would be at JHS that day for another meeting, Mr. Contreras told Ms. Costanzo that he could make himself available to see Trinity “if they have 5 minutes I will like to go into detail as to what we implemented today”—*i.e.*, his instructions that Trinity, as primary vendor, should receive the first call for any air transports.³³ While Mr. Contreras anticipated a brief interaction, he recalled that the February 12th meeting lasted approximately 20 minutes and had a similar feel as the prior meeting, with Trinity complaining about lack of usage under the contract. During this meeting, Ms. Skroder’s brother, Tor, did most of the talking, and Mr. Contreras recalled that

³¹ Email from Ms. Skroder to Ms. Contreras, 2/1/16.

³² Contreras interview.

³³ Email from Mr. Contreras to Ms. Costanzo, 2/11/16.

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he was “very inappropriate” and “got a little aggressive with me” when he attempted to terminate the meeting. Mr. Contreras was anxious to move on to other tasks not involving Trinity.³⁴

Ms. Skroder persisted in her communications. Two days after the February 12th meeting, on February 14th—Valentine’s Day—she called Mr. Contreras regarding a patient transport issue. Mr. Contreras recalled that he took this call on a Sunday when he was driving back from the Keys with his wife.³⁵ Then, a few days later, Ms. Skroder emailed Mr. Contreras with the subject line “JHS – Transport Procedure for Incoming & Outgoing Patients for Jackson.” In the email, Ms. Skroder states that, for “incoming patients,” Trinity will “obtain ‘Financial Clearance’ & Acceptance from the Jackson International or Jackson Domestic Department, and then Trinity will transport and then bill Jackson.” For “outgoing patients,” Trinity would confirm health insurance coverage “and then Trinity will transport and then bill Jackson.” Ms. Skroder described a particular patient at JHS who Trinity was prepared to transport to Virginia — an outbound transfer. Ms. Skroder instructed her assistant to “go ahead and activate our crew for the air ambulance.” She then stated, “Alex – moving forward we will follow [these] procedures and just perform the missions – without having to bother you on each mission.”³⁶

Mr. Contreras did not respond to this email. When asked why he did not respond, and if he was concerned that Trinity would act unilaterally to alter the JHS-Trinity arrangement, he stated that, in the first meeting, he believed he had communicated “very clearly” to Trinity that JHS would follow the system’s normal practices. He added that, having gone through the RFP process, he thought that Trinity would understand that any modification would have to be in writing and go through a similar process.³⁷

Trinity began invoicing JHS for patients that Trinity had transported to the hospital. For instance, on February 23, 2016, Maria Pejdanovska from Trinity sent an invoice to Mr. Verdecia for a patient that Trinity transported to JHS the prior day. The patient came from outside the U.S. As Director of Transportation, Mr. Verdecia is responsible for arranging domestic transportation. Air ambulance constitutes a very small portion of his responsibilities. When asked to approve an invoice, Mr. Verdecia consults a transportation log to ensure that the patient was indeed transported. Here, because the patient was an international patient, he did not have access to a log reflecting the transfer.³⁸ Therefore, Mr. Verdecia responded, “I need a little more info on this one who arranged this call?” Maria Pejdanovska from Trinity responded, copying Mr. Contreras,

³⁴ Contreras interview.

³⁵ *Id.*

³⁶ Ms. Skroder email to Mr. Contreras, 2/18/16.

³⁷ Contreras interview.

³⁸ Interview with Ernest Verdecia, 12/16/19.

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“Further to Inger Lisa’s meeting with Mr. Contreras, we are following the directive of potential patients needing admission are to be ‘Financially Cleared’ by Jackson International. Once the patient is ‘financially cleared’ we transport to Jackson Memorial in Miami or Jackson North in North Miami depending on the patient’s medical needs and bed space.”³⁹ Mr. Contreras did not respond to this email.⁴⁰

The Trinity invoices kept coming. On March 8, 2016, Ms. Pejdanovska emailed Mr. Contreras attaching an invoice for “transport of patient that we brought to Jackson-Ryder Trauma Center yesterday March 7th, 2016.” Mr. Contreras responded, “I do not process invoices,” copying Mr. Verdecia on the message.⁴¹ In an interview, Mr. Contreras stated that he believed that Trinity was attempting to “bypass” JHS’s normal procedures, that he did not want to be involved, and that Trinity should have dealt with either Mr. Verdecia in the Transportation Department or Ms. Corrales in the International Department.⁴²

Stymied by Mr. Contreras, Trinity turned to Mr. Verdecia. On a Saturday, April 2, 2016, Ms. Skroder emailed Mr. Verdecia, asking “what is the status of our invoices as we have not received payment for some time.”⁴³ Mr. Verdecia attempted to understand why he was being asked to approve invoices for incoming air ambulance international patients. He asked Trinity to provide him with all invoices for patients that they had brought into Jackson in the past 60 days. Trinity provided him with this information on April 7th.⁴⁴ Mr. Verdecia then communicated with Ms. Armengol from the International Department, asking her to verify the invoices. Ms. Armengol advised him that she had reviewed the invoices and “we are unaware of the reasons why Trinity would be billing JMH. Therefore, as per Diamela please reach out to Mr. Contreras for further insight.”⁴⁵

The next day, on April 7, 2016, Mr. Verdecia emailed Mr. Fernandez, copying Mr. Contreras, explaining the situation and asking if he could “check with Alex Contreras maybe there is an arrangement I don’t know about?”⁴⁶ Mr. Contreras responded to the email, stating “If

³⁹ Email from Maria Pejdanovska to Mr. Verdecia, 2/23/16.

⁴⁰ According to the OIG draft report, Mr. Verdecia did not approve this invoice, although he did approve a separate invoice for a patient transported to JHS on February 19, 2016. *See* OIG draft report, pp. 20-21.

⁴¹ Email from Ms. Pejdanovska to Mr. Contreras, 3/8/16.

⁴² Contreras interview.

⁴³ Email from Ms. Skroder to Mr. Verdecia, 4/2/16.

⁴⁴ Email from Ms. Pejdanovska to Mr. Verdecia, 4/7/16.

⁴⁵ Email from Ms. Armengol to Mr. Verdecia, 4/6/16.

⁴⁶ Email from Mr. Verdecia to Mr. Fernandez, 4/7/16.

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patient had insurance the insurance company should be billed.”⁴⁷ Three minutes later, in response to a separate email from Mr. Verdecia asking him to “please advise” about the payment of outstanding Trinity invoices, Mr. Contreras wrote “Follow up standard procedure for processing patients.”⁴⁸ The following day, Mr. Contreras reiterated this guidance in an email to Mr. Verdecia and Ms. Corrales, stating “We need check if patients had insurance and provide this information. If insurance does not pay we need to. Insurance info must be provided so they can bill if they can get pay [sic][.]”⁴⁹ In an interview, Mr. Contreras explained that, if JHS requested a patient transport, he believed that, if the patient’s insurance did not pay for the transport, JHS should cover the balance.⁵⁰ On Monday, April 11th, Ms. Corrales responded to Mr. Contreras that her department would gather this information, and the results would most likely be ready the following day.⁵¹ Meanwhile, Mr. Verdecia informed Trinity that, per instructions from the International Department, the invoices were not approved.⁵²

Undaunted, Trinity elevated the issue to Ms. Costanzo. On April 8, 2016, Ms. Skroder called Ms. Costanzo and followed up with an email. Ms. Skroder wrote, “When we met with Alex, he advised us that he wanted patients and for us to: 1. Financially & Medically clear the patients thru Jackson International or Domestic 2. Arrange transportation to Jackson 3. Then bill Jackson thru our contract . . .”⁵³ Ms. Costanzo forwarded the email to Mr. Contreras and wrote “These invoices require payment for Trinity. There are a few like this. I believe they understand they are to bring patients bill and then go after insurance for these cases.” Mr. Contreras responded, “I understand but I do not process. I want to be involved only if there is a major issue. Ernie is got to handle day to day.” Ms. Costanzo responded:

I understand. I’m sorry to bother you with it. I was not asking you to process I understand you are a SVP in our system. I wanted to share it with you because I feel that he is not understanding the bigger picture on how we need to move quickly to have the patients come here instead of our competition. We turn them away and Broward and Baptist pick them up quickly.

⁴⁷ Email from Mr. Contreras to Mr. Verdecia, 4/7/16 (1:12 PM).

⁴⁸ Email from Mr. Contreras to Mr. Verdecia, 4/7/16 (1:15 PM).

⁴⁹ Email from Mr. Contreras to Ms. Verdecia and Ms. Corrales, 4/8/16.

⁵⁰ Contreras interview, 1/3/20.

⁵¹ Email from Ms. Corrales to Mr. Contreras and Mr. Verdecia, 4/11/16.

⁵² Email from Mr. Verdecia to Ms. Pejdanovska, 4/8/16.

⁵³ Email from Ms. Skroder to Ms. Costanzo, 4/8/16.

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Mr. Contreras responded, “I want to be able to address when it is escalated. I already e mail Ernie”⁵⁴—a reference to his emails the prior day.

Mr. Contreras stated that he did not recall this email, and that it should have been a “red flag” for him. As for Ms. Costanzo, she explained her state of mind regarding the Trinity situation in interviews. In her February 1st email to Mr. Contreras, where she described the proposal as an “opportunity,” and in the April 8th email described immediately above, Ms. Costanzo appears to be advocating for the proposal that JHS pay Trinity for incoming patients. Ms. Costanzo stated that, as a general matter, she understood that the hospital could not “entice” patients from a vendor such as Trinity, and she said that she had “some concerns” about the arrangement. But, she believed that it should be Mr. Contreras, not her, who should decide whether or not to accept the proposal, and she was just passing along information. Ms. Costanzo said that “Trinity was complaining, and I was trying to get Alex to take care of the issue with his team and just get me out of the situation . . . I was being inundated by Trinity. . .” Ms. Costanzo further stated that she “didn’t give it much thought” but that she “didn’t realize what the vendor was recommending was something we shouldn’t be doing . . . I was just passing on the information that they gave to me. I had no intent to break the law or cause any problems.” Ms. Costanzo said that she only realized that the Trinity proposal was inappropriate after being contacted by either Trinity compliance personnel or Executive Vice President and Chief Operating Officer Don Steigman, after the invoices were approved.⁵⁵

D. Approval of Trinity Invoices

Trinity ultimately found an avenue at JHS that resulted in payment of the inbound transport invoices. On April 11, 2016, someone from Trinity called Mr. Alvarez, the Procurement Manager. The Trinity representative informed Mr. Alvarez that Trinity would stop transporting organs to JHS unless the hospital paid \$173,000 worth of Trinity invoices. Mr. Alvarez believed that this was the first time he had spoken with Trinity.⁵⁶ Mr. Alvarez emailed his colleagues and supervisors, including Carmen Fernandez, Victoria Quintero, and Laura Scott, stating that Trinity’s invoices needed to be paid that day because “[t]his vendor is threatening to stop their services and this is for transplant and we won’t be able to pick up organs.”⁵⁷

Mr. Alvarez contacted Mr. Contreras and requested that he approve the invoices. Mr. Alvarez and Mr. Contreras were longtime colleagues, predating their employment at JHS.

⁵⁴ Emails between Mr. Contreras and Ms. Costanzo, 4/8/16.

⁵⁵ Interviews with Ms. Costanzo, 12/16/19, 12/23/19.

⁵⁶ Interview with Mr. Alvarez, 12/16/19.

⁵⁷ Email from Mr. Alvarez to Ms. Fernandez, Ms. Quintero and Ms. Scott, 4/11/16.

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According to Mr. Alvarez, “I said, Alex, these need to get paid ASAP, please review and sign so we can get AP to pay them. The reason I was rushing was so that service wouldn’t be interrupted. If it wasn’t urgent, I would have just emailed the invoices to him, but since this was urgent, I was in a hurry and I called him and asked if he would approve.” Mr. Alvarez did not recall if he checked the invoices to make sure that they were for organ transport, but he assumed that they were. He does not know if JHS can pay for incoming air ambulance services outside the organ transport context.⁵⁸

Mr. Contreras recalled that Mr. Alvarez contacted him and asked him to immediately process some Trinity invoices. He further recalled that Mr. Alvarez relayed what Trinity had expressed to him regarding the urgency of approving the invoices. Mr. Contreras recalled that the call came in towards the end of the day, around 5:00. He explained that April 11th is his birthday and he had dinner plans that evening.⁵⁹ At 5:19, a series of Trinity invoices were emailed to a number of JHS employees, including Mr. Contreras.⁶⁰ Over the next 15 minutes, Mr. Contreras approved 16 invoices through the Lawson invoice approval system. Mr. Contreras stated in an interview that he reviewed the first invoice, and his recollection was that the invoice was for “regular” transport, as opposed to international transport, and that it looked in order. Mr. Contreras recalled that he approved the invoice, then, in haste, approved the other invoices that were sent to him without reviewing them.⁶¹ Mr. Contreras then emailed Mr. Alvarez, stating, “I think I got them all. I have nothing in my inbox or coming in. My Bday today so I am leaving now. I waited but I am not getting anything more.” Mr. Alvarez thanked him, and Mr. Contreras later responded, “Nothing more came through.”⁶²

When asked if he had any concerns about paying the Trinity invoices, given the recent communications with the vendor, Mr. Contreras stated that he did not, because there are limited instances where JHS will pay air ambulance transportation companies, such as when JHS is requesting outgoing transport for a patient, for instance, to a lower-acuity facility better suited to the patient’s needs. Mr. Contreras stated that he did not realize that these invoices were related to the invoices that Ms. Corrales from the International Department was researching at his request; he stated, “I didn’t put two and two together.” When asked if his compensation was tied in any way to increased revenue at the hospital, Mr. Contreras responded that only a tiny portion of his

⁵⁸ Alvarez interview.

⁵⁹ Contreras interview.

⁶⁰ Email from “ProcessFlow@jhs-miami.org”, 4/11/16. Mr. Verdecia, Mr. Fernandez, Maria Santiago, and Arianet Gonzalez also received the email.

⁶¹ Contreras interview.

⁶² Emails between Mr. Contreras and Mr. Alvarez, 4/11/16.

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compensation was based on increased revenue, and that his incentive compensation was based in larger part on separate factors.⁶³

Unaware that Mr. Contreras had approved the invoices in question, the JHS International Department continued to research insurance coverage for the patients that were the subjects of the outstanding Trinity invoices. At the same hour that Mr. Contreras was approving the invoices, Ms. Armengol emailed Ms. Corrales with the results of her research. Ms. Armengol stated that the request was “confusing” because, in the normal course, an air ambulance company obtains pre-authorization from an insurance company, and bills the insurance company, for payment. Thus, Ms. Armengol was “not sure why JMH is being billed . . .”⁶⁴

Meanwhile, Trinity, also unaware that the invoices had been approved two hours earlier, continued to complain to JHS. On April 11th at 7:56 pm, Ms. Skroder sent a long email to Mr. Contreras and Ms. Costanzo recapping various meetings and communications and her understanding of the new arrangement. Ms. Skroder stated that Trinity had sent 20 patients to JHS under the new arrangement, and she asked when Trinity would receive payment, as “[w]e would like to continue to refer patients to Jackson . . .”⁶⁵

E. JHS Realizes Payments Were Made in Error

The following day, April 12th, Trinity continued to press JHS to approve the invoices. At 10:26, Ms. Skroder emailed Ms. Costanzo asking for an update on the invoices.⁶⁶ The e-mail chain included a message that Ms. Skroder had sent to Ms. Costanzo and Mr. Contreras on April 11th, summarizing her account of their February 12th meeting and outlining her understanding of the JHS-Trinity arrangement. Ms. Costanzo forwarded the email to Mr. Verdecia and Mr. Fernandez, stating, “This should help with payment review and approvals.” Mr. Verdecia forwarded the email to two people. First, he asked Ms. Corrales if Mr. Contreras had approved the arrangement; Ms. Corrales informed him that the International Department “was not aware nor involved in any of these negotiations” and asked to be kept informed.⁶⁷ Second, he asked Mr. Fernandez for his thoughts, stating, “If Alex agreed, I don’t have a problem approving these invoices.” Mr. Fernandez responded, “Yes, approve based on the transport procedure you attached and Alex’s comments from last week.”⁶⁸ Three minutes later, Mr. Fernandez informed

⁶³ Contreras interview.

⁶⁴ Email from Ms. Armengol to Ms. Corrales, 4/11/16 (5:57 pm).

⁶⁵ Email from Ms. Skroder to Mr. Contreras and Ms. Costanzo, 4/11/19 (7:56 pm)

⁶⁶ Email from Ms. Skroder to Ms. Costanzo, 4/12/16.

⁶⁷ Email from Ms. Corrales to Mr. Verdecia, 4/12/16.

⁶⁸ Email from Mr. Fernandez to Mr. Verdecia, 4/12/16 (11:25 am)

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Trinity, Ms. Costanzo, Mr. Verdecia, Ms. Quintero, and Ms. Corrales that “Mr. Verdecia is processing the invoices for payment” and apologized for the delay.⁶⁹

At this point, Ms. Corrales interceded. First, on April 12th, she responded to Mr. Fernandez’s email, copying Mr. Verdecia and Mr. Contreras, and asked, “Can we please discuss before payment?”⁷⁰ Ms. Corrales recalled that she had concerns about JHS paying for inbound airlifts. She recalled that, shortly after sending the email, she called Mr. Contreras to express these concerns. Mr. Contreras suggested that they meet in person. Mr. Contreras, Ms. Corrales, and Mr. Fernandez met to discuss the issue. It is unclear exactly when the meeting took place, but it likely occurred on April 12th or 13th. During the meeting, Ms. Corrales again expressed her concern that the invoices had been approved, although she did not know who had approved them. She recalled that, during the meeting, they shared their collective view that Trinity had been a very difficult vendor to deal with.⁷¹

Over the course of these interactions with Ms. Corrales, Mr. Contreras realized that he had mistakenly approved these invoices on April 11th. On April 12th, he emailed Ms. Skroder, stating that he wanted “to make sure that we are on the same page. I expect that Trinity will bill insurance for patients. If insurance does not cover and we approved they can bill us. We are not a provider and we do not bill.”⁷² Mr. Contreras then forwarded this email to Ms. Corrales and Mr. Verdecia.⁷³

Shortly thereafter, Mr. Contreras informed Don Steigman, Executive Vice President and Chief Operating Officer of JHS, about the mistaken approvals.⁷⁴ This meeting appears to have occurred no later than the morning of April 14th, because at 9:30 that morning, Ms. Costanzo forwarded an email chain regarding Trinity’s understanding of the arrangement to Mr. Steigman and Mr. Contreras, asking “if you need me to communicate with Trinity to make a change to what they have outlined on the attached.”⁷⁵

⁶⁹ Email from Mr. Fernandez to Ms. Costanzo, et al., 4/12/16 (11:28 am) .

⁷⁰ Email from Ms. Corrales to Mr. Fernandez, et al., 4/12/16 (11:31 am).

⁷¹ Corrales interview.

⁷² Email from Mr. Contreras to Ms. Skroder and Ms. Costanzo, 4/12/19 (3:49 pm).

⁷³ Email from Mr. Contreras to Ms. Corrales, Mr. Verdecia, and Mr. Fernandez, 4/12/16 (3:50 pm).

⁷⁴ Contreras interview.

⁷⁵ Email from Ms. Costanzo to Mr. Steigman and Mr. Contreras, 4/14/16 (9:30). Ms. Costanzo recalled that Mr. Steigman called her and stated, “I’m here in my office with Alex and want to make sure you understand we don’t pay for incoming patients, Alex brought it to my attention that we paid some invoices for inbound patients.” Costanzo interview.

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Mr. Contreras attempted to have the payments stopped, but it was too late. On April 14th, he informed Andrew Figueroa to not pay any invoices for Trinity until further notice.⁷⁶ On April 15th, Mr. Contreras emailed Ms. Skroder, copying Mr. Verdecia and Ms. Corrales, stating, “Please be advised that Jackson Health System will only be responsible for outbound flights from our facilities, as approved by our transportation departments.”⁷⁷ Ms. Skroder forwarded this email to Ms. Costanzo, asking, “Will there be an amendment to the contract now?”⁷⁸ Ms. Costanzo responded, “The regulations require that Trinity bill the patient’s insurance and get paid in that manner. We can not pay Trinity for any incoming flights.”⁷⁹

Shortly after these events occurred, Cheryl Wagonhurst, JHS’ interim compliance officer, informed Ms. Hunter about the invoice payments.⁸⁰ Ms. Hunter stated that she was concerned. Among other reasons, she recognized that “we don’t pay for referrals. We don’t pay for someone to transfer patients to us.” The next time that Ms. Hunter saw Mr. Contreras, she asked him about the approvals. She recalled that Mr. Contreras told her, that he should not have signed them, that he had not looked at them, he believed that they were appropriate because he was asked to sign them by a subordinate, but that he was regretful for not paying closer attention to what he was signing. Ms. Hunter believed Mr. Contreras. She believes that he is a person of high character and does not believe that he would have signed something realizing that it was a compliance violation or would create risk to JHS.⁸¹

F. Meeting with Trinity, Compliance Involvement, and Request for Repayment

On June 10th, a meeting was held among JHS and Trinity officials. Ms. Hunter chaired the meeting. Ms. Hunter recalled that Mr. Contreras, Ms. Verdecia, and Ms. Wagonhurst attended, as well as Ms. Skroder and Tor Skroder.⁸² An agenda for the meeting indicates that “compliance requirements” would be discussed.⁸³ Ms. Hunter recalls stating at the outset that JHS values the relationship with Trinity, but that JHS cannot pay for inbound air ambulance transports. She requested that Trinity refund the payments. Ms. Hunter recalled that Ms.

⁷⁶ Email from Mr. Contreras to Mr. Figueroa, 4/14/16 (2:07 pm).

⁷⁷ Email from Mr. Contreras to Ms. Skroder, 4/15/16 (3:26 pm).

⁷⁸ Email from Ms. Skroder and Ms. Costanzo, 4/15/16 (3:45 pm).

⁷⁹ Email from Ms. Costanzo to Ms. Skroder, 4/19/16.

⁸⁰ Interview with Laura Hunter, 12/16/19 (“Hunter interview”).

⁸¹ *Id.*

⁸² Hunter interview. A contemporaneous JHS document indicates that others may have attended as well. See “Jackson Health System/Trinity Air Ambulance Meeting” document, listing meeting attendees.

⁸³ See “Jackson Health/Trinity Air Ambulance Meeting” Agenda.

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Wagonhurst explained that the payments potentially violated the federal Anti-Kickback Law, and attempted to hand out a document summarizing the law. Ms. Hunter recalled that Ms. Skroder and her brother got very angry and charged that “JHS was paying Reva, so why can’t they pay Trinity?” Ms. Hunter recalled explaining that JHS only pays for outbound transports, in limited situations. Ms. Hunter further explained that the issue needs to be resolved because it was a liability for JHS and Trinity. At this point, Ms. Hunter recalled that Tor Skroder became visibly agitated, saying, “You can’t come in here and tell me that something is a liability to my company.” The Skroders were angry and raising their voices. Ms. Hunter recalled feeling physically threatened by Mr. Skroder, but she stood her ground and reiterated JHS’ position. Ms. Hunter could not recall another meeting with a vendor that was this “hot.”⁸⁴

From Ms. Hunter’s perspective, Trinity did not understand the gravity of the issue; their focus was on the competitive relationship vis a vis REVA, and they simply did not want to pay the money back. Her impression was that Trinity did not have any idea that what they had proposed was illegal: “[t]hey weren’t coming at it like ‘we know this is out of compliance [but] let’s get them to pay for referrals.’”⁸⁵

Mr. Contreras also recalled the meeting, and his recollection was substantially similar to Ms. Hunter’s. Mr. Contreras also recalled that Ms. Skroder stated during this meeting that she believed that the Trinity-JHS agreement had been amended, consistent with her emails to various JHS employees. Mr. Contreras recalled stating that this was the first time he had ever heard Ms. Skroder or anyone else from Trinity describe their understanding regarding the change in the agreement, and that any change like that would require a written amendment to the agreement. He recalls Ms. Skroder agreeing and stating that “we didn’t communicate clearly.” At this point, Mr. Contreras recalls Mr. Skroder becoming very aggressive and actually getting out of chair and approaching Ms. Hunter. He recalls Mr. Skroder yelling, “you stole, you lie, you need to pay us!” Mr. Contreras believes that “the vendor had no clue about the applicable regulatory requirements.” He believes that they were not a “sophisticated” operation based on their behavior towards JHS.⁸⁶

Subsequent to this meeting, Trinity sent invoices for inbound transport of two additional individuals. On July 7, 2016, Luis Fernandez sent a letter to Ms. Skroder referencing these invoices. Mr. Fernandez reminded Ms. Skroder of the June 10th meeting and stated that “Jackson

⁸⁴ Hunter interview.

⁸⁵ *Id.*

⁸⁶ Contreras interview.

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Health System is prohibited by law for billing for inbound patients,” instructing Trinity to bill the patients’ insurance directly.⁸⁷

On October 11, 2016, Mr. Contreras wrote a letter to Ms. Skroder regarding the mistakenly-approved invoices. Mr. Contreras stated that the invoices and payments were inappropriate and requested a refund of \$303,635.29. Mr. Contreras also stated that “We have made the offer, on several occasions, for Trinity’s attorney to speak to the PHT’s counsel in order to more fully understand the legal and regulatory obligations at issue. The PHT’s offer still stands, and we encourage you to reach out.”⁸⁸ Trinity did not respond to this letter. Mr. Contreras sent a follow-up letter on January 13, 2017 reiterating the request and asking for contact information for Trinity’s counsel.⁸⁹ Trinity did not respond to this letter, either.

Between April and June 2016, JHS’ OCE conducted an internal investigation regarding the Trinity matter, concluding that the invoices were paid in error and that there was no wrongdoing on JHS’ part. According to the OIG draft report, Trinity informed the OIG about this matter on April 20, 2017. On May 26, 2017, the OIG contacted JHS about the Trinity matter. In the summer of 2017, OCE conducted a second investigation and had several meetings with the OIG. The OIG then launched its investigation.

In its second review, OCE concluded, again, that the payments were made in error and that there was no wrongdoing by anyone at JHS. Nevertheless, in September 2017, JHS refunded to federal healthcare programs payments equivalent to the amounts received by JHS for the patients with federal insurance transported to JHS by Trinity. This amount was \$641,234.06 for 11 patients.⁹⁰

⁸⁷ Letter from Mr. Fernandez to Ms. Skroder, 7/7/16.

⁸⁸ Letter from Mr. Contreras to Ms. Skroder, 10/11/16.

⁸⁹ Letter from Mr. Contreras to Ms. Skroder, 1/13/17.

⁹⁰ OIG draft report, at 46.

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IV. Legal Background

The JHS-Trinity relationship potentially implicates a number of federal health care laws and regulations.

A. Anti-Kickback Statute

The federal anti-kickback statute, 42 U.S.C. § 1320a-7b(b) (the “AKS”), prohibits payments as inducement for referrals of beneficiaries of federal health care programs. As applicable here, the AKS provides as follows:

(2) Whoever knowingly and willfully offers or pays any remuneration (including any kickback, bribe, or rebate) directly or indirectly, overtly or covertly, in cash or in kind to any person to induce such person—

(A) to refer an individual to a person for the furnishing or arranging for the furnishing of any item or service for which payment may be made in whole or in part under a Federal health care program, or

(B) to purchase, lease, order, or arrange for or recommend purchasing, leasing, or ordering any good, facility, service, or item for which payment may be made in whole or in part under a Federal health care program,

shall be guilty of a felony and upon conviction thereof, shall be fined not more than \$100,000 or imprisoned for not more than ten years, or both.⁹¹

Thus, to prove that the AKS has been violated, the government must demonstrate that the defendant (1) knowingly and willfully, (2) offered or paid remuneration to a person, (3) to induce the person to purchase, lease, order, or arrange for or recommend purchasing, leasing, or ordering, (4) any service/item payable by a Federal health care program.

Inclusion of the “knowingly and willfully” element classifies the AKS as a “specific intent” law. In this context, “knowingly and willfully” means that the defendant recognized that

⁹¹ 42 U.S.C. §1320a-7b(b)(2).

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the conduct at issue was unlawful in some way.⁹² The government does not have to prove that the defendant knew that the conduct violated the AKS, but, rather, that defendant recognized that the conduct was unlawful.⁹³ Federal health care programs for the purposes of the AKS include Medicare, Medicaid, TRICARE, and the Veterans' Administration.

The AKS has criminal as well as civil penalties. The government can prosecute an AKS violation with a maximum term of incarceration of ten years. The AKS can also be enforced under the Civil Monetary Penalties ("CMP") Law.

Finally, because the AKS potentially ensnares conduct that is perfectly legal in other industries (such as referral fees), Congress has promulgated a number of regulatory "safe harbors."⁹⁴ Conduct which fits within a regulatory safe harbor is shielded from AKS scrutiny.

B. False Claims Act

The False Claims Act, 31 U.S.C. § 3729 (the "FCA"), imposes liability upon any person or entity that knowingly presents a false claim to the government for payment or knowingly makes, uses or causes a false statement material to a false or fraudulent claim.⁹⁵ To prove that an individual has violated the FCA, the government must show that the defendant acted "knowingly" and "willfully" with respect to the "false" information at issue. As defined for FCA purposes, the terms "knowingly" and "willfully" require that the person 1) had actual knowledge of the information, 2) acted in deliberate ignorance of the truth or falsity of the information, or 3) acted in reckless disregard of the truth or falsity of the information.⁹⁶

An AKS violation constitutes a false or fraudulent claim for purposes of the FCA.⁹⁷ FCA violations are subject to treble damages and penalties of \$11,181–\$22,363 per claim for penalties assessed after January 1, 2018.⁹⁸

⁹² In contrast, "general intent" crimes are those in which the illegality of the action is so obvious, the government does not have to prove that the defendant understood what s/he was doing was unlawful. For these crimes, the government only has to show that the defendant "knowingly" committed the act, as opposed to doing it by mistake.

⁹³ See, e.g., *U.S. ex rel. Medrano v. Diabetic Care Rx, LLC*, 2018 U.S. Dist. LEXIS 204225, *8 (S.D. Fla., Nov. 30, 2018).

⁹⁴ See 42 C.F.R. § 1001.952(a)-(bb).

⁹⁵ 31 U.S.C. § 3729(a)(1)(A)-(B).

⁹⁶ 31 U.S.C. § 3279(b)(1)(A).

⁹⁷ 42 U.S.C. § 1320a-7b(g).

⁹⁸ 28 C.F.R. § 85.5.

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C. Return of Overpayments

Health care providers and suppliers rendering services to beneficiaries of federal health care programs must report and return “overpayments” to the Centers for Medicare & Medicaid Services (“CMS”). The overpayment must be reported and returned by the later of 60 days after its “identification” or the date any corresponding cost report is due, if applicable.⁹⁹ An “overpayment” means “any funds that a person has received or retained ... to which the person, after applicable reconciliation, is not entitled ...”¹⁰⁰ A person has “identified” an overpayment when “the person has, or should have through the exercise of reasonable diligence, determined that the person has received an overpayment and quantified the amount of the overpayment.”¹⁰¹

Retaining an overpayment beyond the deadline for reporting and returning can have serious consequences. Most importantly, retention of an overpayment is considered an “obligation” under the FCA.¹⁰² In addition, the Department of Health and Human Services (“HHS”) is authorized to impose CMPs upon any person who knows of an overpayment but does not report and return such overpayment in accordance with 42 U.S.C. § 1320a-7k(d)(3).¹⁰³ Finally, retention of an overpayment can result in exclusion from federal health care programs.¹⁰⁴

Importantly, CMS has stated that payments for claims resulting from AKS violations are overpayments within the meaning of the law.¹⁰⁵

D. Medicare Claims Submission Process

CMS requires physicians and suppliers providing services to Medicare beneficiaries to submit claims for those services to Medicare, not the beneficiary receiving the services or any other entity.¹⁰⁶ Medicare claims are not submitted to CMS directly, but rather to Medicare Administrative Contractors (“MACs”). MACs are private health care insurers who have been awarded geographic jurisdiction to process Medicare Part A, Part B or DMEPOS claims for Medicare fee-for-service beneficiaries; their responsibilities include determining the appropriate

⁹⁹ 42 U.S.C. § 1320a-7k(d).

¹⁰⁰ 42 C.F.R. § 401.303.

¹⁰¹ 42 C.F.R. § 401.305(a)(2).

¹⁰² 42 U.S.C. § 1320a-7k(d)(3).

¹⁰³ 42 U.S.C. § 1320a-7a(10).

¹⁰⁴ *Id.*

¹⁰⁵ 81 Fed. Reg. 7654, 7659 (Feb. 12, 2016).

¹⁰⁶ 42 U.S.C. § 1395w-4(g)(4)(A).

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payment amount for claims that providers and suppliers submit for payment.¹⁰⁷ The MAC for Medicare Part B claims in Florida is First Coast Service Options, Inc.

CMS issues claim processing instructions to MACs through the Medicare Claims Processing Manual, CMS Publication No. 100-04 (the “MCPM”). Each MCPM chapter contains a range of information regarding claims processing, including how to apply general Medicare concepts to a Medicare service. Ambulance services, including air ambulance services, are addressed in MCPM Chapter 15. Medically necessary air ambulance services are outlined as a Medicare covered benefit in Medicare Benefit Policy Manual (“MBPM”) Chapter 10, “Ambulance Services,” Section 10.4, “Air Ambulance Services.”

Generally speaking, “supplier” is defined as “a physician or other practitioner, or an entity other than a provider, that furnishes health care services under Medicare.”¹⁰⁸ As applied to ambulance services, MCPM Chapter 15 provides, in relevant part, “[f]or purposes of this chapter, the term supplier is defined as any ambulance service that is not institutionally based. A supplier can be an independently owned and operated ambulance service company ... that provides Part B Medicare covered ambulance services and is enrolled as an independent ambulance supplier.”¹⁰⁹

Thus, pursuant to 42 U.S.C. § 1395w-4(g)(4)(A), a non-institutionally based, independently owned and operated ambulance service company is a “supplier” for purposes of the Medicare program. As a result, such air ambulance suppliers must submit claims for air ambulance transportation services provided to Medicare beneficiaries to the MAC of local jurisdiction for claims processing.

¹⁰⁷ 42 U.S.C. § 1395kk-1(a)(4)(A). Medicare Part A covers institutional services, such as hospital care. Medicare Part B covers outpatient medical costs, such as doctor’s visits.

¹⁰⁸ 42 C.F.R. § 400.202.

¹⁰⁹ MCPM Ch. 15, § 10.3, “Definitions.”

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V. Analysis and Response to OIG Draft Report's Conclusions

In this section, we analyze the facts and law and reach certain conclusions. Then, we make suggestions to respond to specific assertions and recommendations in the OIG draft report.

A. Analysis and Conclusions

The evidence described above, and in the OIG draft report, establishes the following key facts:

- Trinity was a difficult, extremely aggressive vendor who complained to JHS frequently about its usage and getting its invoices paid.
- On numerous occasions, Trinity pressed JHS to amend the contract such that Trinity would bill JHS directly for the costs of transporting international patients to JHS, rather than billing patients' insurance. Trinity raised this proposal on several occasions, in person, on the telephone, and in email, to several JHS executives. Trinity clearly communicated that its goal was to bring more patients to JHS.
- The Trinity proposal, at least as it related to Medicare beneficiaries, was contrary to Medicare regulations and claims processing procedures.
- The contract was never formally amended. Amendment of a contract initiated by an RFP is governed by a formal process within the PHT.
- There is no evidence that Mr. Contreras agreed to Trinity's proposal. Trinity communicated the proposal to Mr. Contreras on several occasions, and Trinity employees indicated in email communications that they believed JHS agreed with the proposal. But there is no evidence that Mr. Contreras agreed with, or accepted, the proposal.
- On several occasions, Mr. Contreras did not respond to email communications where the proposal was mentioned. Mr. Contreras took a "hands off" approach regarding Trinity.
- The evidence indicates that Ms. Costanzo was in favor of the proposal. However, she did not have authority to change the contract on her own, and did not believe that deciding whether JHS should modify an arrangement was her responsibility, so she deferred to Mr. Contreras. Moreover, Ms. Costanzo stated that, at the time, she was unaware that the proposal potentially violated the AKS. There is no evidence to contradict her statement.

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- On numerous occasions, Trinity invoiced JHS for inbound transport of international patients.
- Between January and April, 2016, Trinity contacted several different JHS employees, including Mr. Contreras, Ms. Costanzo, Mr. Verdecia, and Mr. Alvarez, demanding that JHS pay Trinity's outstanding invoices.
- In the days leading up to April 11, 2016, some JHS officials, including Mr. Verdecia, Ms. Corrales, and Ms. Armengol, expressed confusion about why JHS was being invoiced for incoming international patient transports by Trinity. Mr. Contreras was copied on some of these communications.
- In response to these communications, Mr. Contreras expressed his view that JHS should follow its normal process regarding these transports, and that Trinity should bill patients' insurance first. Mr. Contreras also expressed his view that, if insurance did not pay for the transports, Trinity could bill Jackson.
- On April 11, 2016, Trinity informed Mr. Alvarez in a phone call that it would cease organ transports if JHS did not immediately pay its outstanding invoices. Mr. Alvarez believed that the invoices in question were for organ transports. Mr. Alvarez called Mr. Contreras and urged him to approve the invoices.
- April 11th is Mr. Contreras' birthday. Mr. Alvarez called him about the invoices late in the day. Mr. Contreras had dinner plans and was anxious to leave that day.
- Over the course of approximately 15 minutes, Mr. Contreras approved several Trinity invoices for inbound transport of international patients.
- Mr. Fernandez instructed Mr. Verdecia to approve certain Trinity invoices based on his mistaken belief that Mr. Contreras had agreed to an arrangement with Trinity permitting payment by JHS to Trinity for inbound transport of international patients.
- Three days later, after discussing the matter with Ms. Corrales, Mr. Contreras reported the matter to Mr. Steigman, attempted to stop the payments, and informed Trinity that JHS cannot pay for inbound transport of patients.
- Subsequent to the payments, JHS had several communications, in person and in writing, with Trinity, attempting to explain to Trinity that its proposal was improper, that the

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payments were made in error, and requesting a refund. Trinity refused to refund the payments.

- JHS refunded payments that it received for services provided to the Medicare patients Trinity had transported to JHS.

Based on these facts, we believe that JHS did not agree to Trinity's proposal, that the contract was never amended, and that the approval of Trinity invoices on April 11th was done in error. The approval of the invoices resulted from a constellation of unfortunate events, including (1) Trinity's campaign of aggressive communications attempting to alter the contract in the winter and early spring of 2016, (2) Mr. Contreras' failure to respond to Trinity's repeated entreaties and communicate that its proposal was not accepted, (3) Ms. Costanzo's acquiescence to the proposal and failure to understand that it was unlawful, (4) a failure amongst JHS executives to effectively communicate internally regarding the Trinity proposal, (5) Trinity's threat on April 11th to cancel organ transport (an absolutely critical service), and Mr. Alvarez's communication to Mr. Contreras that the invoices needed to be approved urgently, (6) Mr. Alvarez's failure to appreciate that the invoices in question were for inbound transport of international patients, not organ transport, and (7) Mr. Contreras' failure to carefully review the invoices in question, due to the circumstances surrounding the invoices crossing his desk.

It is apparent that Ms. Costanzo, unaware of the legal ramifications of Trinity's proposal, agreed with and recommended that Mr. Contreras accept it, which may have contributed to Trinity's actions. And it seems clear that Mr. Contreras should have been more proactive in his communications with Trinity. While we take at face value his assertion that, during the January 21st meeting, he informed Trinity that JHS did not agree with the proposal, when Trinity continued to press the proposal over the next few months and expressed its belief that the proposal was accepted, Mr. Contreras should have informed them that the contract would not be changed, rather than ignore the communications.

We also have concerns about certain statements made by Mr. Contreras during the various inquiries related to this matter. First, Mr. Contreras stated to OCE and to us that, on April 11th, he reviewed one invoice that was a "regular" transportation invoice, meaning that it was not for an international air ambulance transport, and that it looked fine to him, so he approved that invoice as well as all others from Trinity that day. Like the OIG, we reviewed the invoices that were sent to Mr. Contreras for approval on April 11th, and we did not identify any invoices for local transportation; the only transportation invoices were the Trinity Air Ambulance invoices for inbound transport of international patients. We cannot reconcile Mr. Contreras' statements with the documentation that was provided to him on April 11th.

Second, on multiple occasions, Mr. Contreras informed JHS and Trinity personnel that "[i]f insurance does not pay we need to," before ultimately informing Trinity that JHS could not

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pay for inbound transport.¹¹⁰ Mr. Contreras stated to us that what he had in mind was a situation where the request for inbound transport was initiated by JHS; in that context, he believes that if the patient's insurance does not cover the cost of the transport, it is appropriate for JHS to figure out a way to pay the difference. However, here Trinity was demanding payment of air ambulance invoices for transport of international patients. There is nothing in the underlying emails suggesting that JHS initiated the request. Rather, this occurred in the context of Trinity making repeated requests over the prior three months to change the contract, so it is unclear why Mr. Contreras would apply his general understanding that JHS should pay if a patient's insurance did not to this context. Moreover, Mr. Contreras stated to us that he understood that what Trinity had proposed was problematic from a compliance perspective. If he understood this, it is unclear why Mr. Contreras would believe that JHS should *ever* pay any portion of the inbound transport fee to the provider, even if JHS requested the transport.

Notwithstanding these concerns, the evidence indicates that Mr. Contreras never agreed with or accepted Trinity's proposal, and the contract was never amended by anyone at JHS. There was no "meeting of the minds." Rather, we conclude that Mr. Contreras did not accept Trinity's proposal but nevertheless approved the invoices erroneously on April 11th. We reach this conclusion based on the totality of the evidence, including the lack of evidence that Mr. Contreras agreed to the proposal, his communications leading up to April 11th indicating that the proposal had not been accepted and that standard procedures should be followed, the circumstances of the invoice approvals, and his conduct upon learning that he had mistakenly approved invoices for inbound international transport—including immediately reporting the matter to Mr. Steigman and attempting to cancel the payments. We believe that Trinity is primarily responsible for causing the invoices to be approved, based on its course of dealing with JHS and its conduct leading up to, and on, April 11th.

Applying these facts to the law, we cannot conclude that JHS and Trinity entered into an arrangement in violation of the AKS. It is clear to us that no one from JHS knowingly and willfully paid or received a kickback to or from Trinity in order to induce the referral of patients with federal health insurance. We do not believe that Mr. Contreras understood that he was approving invoices for inbound transport. The only JHS employee who appears to have agreed with the Trinity proposal was Ms. Costanzo, but she did not realize that the proposal was unlawful. The AKS is a specific intent law, and there is no violation if a party agrees to an arrangement without realizing that it is unlawful.

It is a closer call on the Trinity side. There is no question that Trinity intended for JHS to pay Trinity directly for inbound transport in order to generate more business. This is clearly the

¹¹⁰ See, e.g., email from Mr. Contreras to Mr. Verdecia, et al., 4/8/16; email from Mr. Contreras to Ms. Skroder, et al., 4/12/16.

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type of act that the AKS prohibits. However, as mentioned above, there is only a violation if a party acts with the required mental state—understanding that the act is unlawful. It is certainly true that federal enforcement of health care fraud, including the AKS, has been highly publicized in recent years, including (perhaps especially) in south Florida. One would expect that, in this day and age, any health care provider would understand that actions such as the Trinity proposal violate the AKS. Finally, the RFP itself required that any accepted vendor must follow all federal laws and regulations. The best evidence of Trinity’s state of mind would be contemporaneous text messages, internal emails, and statements, but this information was unavailable to us, and we were also unable to interview Trinity personnel. Therefore, our assessment of Trinity’s state of mind is limited to its email communications with JHS and JHS employees’ recollections of their interactions with Trinity. Based on this record, a picture emerges of a small, unsophisticated “mom and pop” vendor that was extremely aggressive and business-oriented. JHS officials who interacted with Trinity believed that they did not understand that their proposal was unlawful. We credit these impressions and find no evidence in the record to contradict it. While it is a close call, we cannot conclude that Trinity acted knowing that its conduct was unlawful. Therefore, we do not believe that either party intended to enter into an arrangement in violation of the AKS.

Because we do not believe there is sufficient evidence of a kickback arrangement, liability would not be triggered under the AKS, the Civil Monetary Penalties Law, or the FCA. Moreover, the “60 day rule” would also not be implicated, because there was no kickback resulting in an overpayment.

B. Specific Responses to OIG Assertions

The OIG draft report makes many conclusions and assertions, as well as three specific recommendations. Without responding to each and every statement, we recommend that JHS respond to the following OIG assertions:

1. Assertion that JHS Acquiesced With Trinity’s Proposal

a. *OIG Assertion*

The OIG’s primary conclusion is that “Trinity’s initiative to transport patients into JHS and bill the AA contract was done with the knowledge and acquiescence of JHS vice presidents.”¹¹¹ The OIG concludes that the parties had a “mutual understanding” of the Trinity proposal and that the payments were not made by mistake. The OIG reached this conclusion based on its determination that Mr. Contreras “failed to heed the repeated concerns raised by

¹¹¹ OIG Draft Report, at 8.

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subordinate managers.”¹¹² And the OIG repeatedly criticized Mr. Contreras for failing to “repudiate” Trinity’s proposal.¹¹³

a. *Suggested Response*

The evidence does not support this conclusion. As discussed above, while Trinity repeatedly pressed its proposal to alter the contract such that JHS would pay Trinity for inbound transport of international patients, there is no evidence that Mr. Contreras agreed to this proposal. Mr. Contreras stated that, in the first meeting, he informed Trinity that JHS did not agree to the Trinity proposal. His recollection is corroborated by Ms. Costanzo. There is no evidence to refute their recollection, and the email traffic supports the conclusion that Mr. Contreras did not agree to the proposal. Regarding the “concerns” of JHS personnel that were surfaced to him prior to April 11th, Mr. Contreras informed them that patients’ insurance companies should be billed for air transport and that JHS should “follow standard procedure” in processing payments. These statements were appropriate and do not support the view that Mr. Contreras agreed to an alteration of the contract along the lines of Trinity’s suggestion.

Moreover, while it would have been a better practice to respond to Trinity’s emails and “repudiate” their apparent understanding, there is simply no evidence that Mr. Contreras agreed to the proposal. Silence is not acquiescence to a contract, and Trinity should not have acted unilaterally.¹¹⁴ In addition, when Mr. Contreras realized that he had made a mistake, he did not try to cover up or hide it. To the contrary, within four days of the invoice approvals, Mr. Contreras took appropriate steps to notify his supervisor, attempt to stop the payment, and inform Trinity that JHS would not pay for inbound transport. These are not the actions of a party to an illicit arrangement.

At most, one JHS employee, Ms. Costanzo, was supportive of Trinity’s proposal, but she did not have authority to change a contract unilaterally, she deferred to Mr. Contreras, and, most importantly, she did not realize at the time that the Trinity proposal was unlawful.

¹¹² *Id.* at 7.

¹¹³ *Id.* at 16; 17 (“absence of a clear and decisive repudiation”; 33 (“neither Mr. Contreras nor Ms. Costanzo took any action to clarify any misperceptions Trinity may have had regarding their understanding of this new business under the contract”); 35 (“If . . . there had been a misunderstanding between the parties, both Ms. Costanzo and Mr. Contreras should have, at this point, addressed the matter with Trinity.”); 43 (on April 11th, “Mr. Contreras did not repudiate the agreement in his reply . . .”).

¹¹⁴ *See, e.g., W. Constr. Inc. v. Fla Blacktop, Inc.*, 88 So. 3d 301, 305 (Fla. Dist. Ct. App. 2012) (no contract where second party responds with silence rather than assent); *see generally* Restat. 2d of Contracts, § 69 (silence does not constitute acceptance of an offer except in rare circumstances).

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2. Assertion that the Invoices Were Knowingly Approved

a. *OIG Assertion*

The OIG concluded that “[t]he invoices submitted by Trinity for the inbound flights of patients referred to JHS facilities were knowingly approved for payment” and that “[t]he bulk of the payments were knowingly and intentionally approved by Mr. Contreras.”¹¹⁵

b. *Suggested Response*

The evidence is more consistent with the conclusion that Mr. Contreras approved the invoices by mistake. As discussed above, in the days, weeks and months leading up to April 11th, an extremely aggressive vendor repeatedly contacted numerous JHS individuals demanding payment of invoices. On April 11th, Trinity threatened to Mr. Alvarez that it would stop transporting organs to JHS unless its outstanding invoices were paid. Mr. Alvarez communicated this to Mr. Contreras and asked that he approve the outstanding invoices. Mr. Alvarez’s call came in late in the day on Mr. Contreras’ birthday, when he had dinner plans. Mr. Contreras relied on Mr. Alvarez and others that the invoices were appropriate, and he approved the invoices in haste. As discussed above, the communications leading up to April 11th do not indicate that Mr. Contreras had accepted Trinity’s proposal. Moreover, Mr. Contreras had no financial motivation to cause JHS to pay Trinity for inbound transport of international patients., When Mr. Contreras later realized that he made a mistake, he took appropriate actions, including contacting his supervisor, attempting to stop payment, and informing Trinity that JHS will not pay for incoming transport. The evidence simply does not support the conclusion that Mr. Contreras “knowingly and willfully intentionally” paid Trinity for inbound transport of international patients.

3. Insinuation That Mr. Contreras Did Not Attempt to Stop the Payments in a Timely Fashion

a. *OIG Assertion*

The OIG concludes that “there were no efforts to stop the payments until the Chief Operating Officer of JHS was alerted to the improprieties.”¹¹⁶ The insinuation is that Mr. Contreras intentionally failed to make efforts to stop the payments until he was instructed to do so by Mr. Steigman.¹¹⁷

¹¹⁵ Draft OIG Report, at 18.

¹¹⁶ OIG draft report, at 7.

¹¹⁷ OIG draft report, at 42.

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b. *Suggested Response*

This assertion is misleading and the insinuation is not borne out by the evidence. The record reflects that, shortly after approving the invoices, Mr. Contreras realized that he made a mistake. He realized that he made a mistake after speaking with Ms. Corrales, which likely occurred on April 12th or April 13th. Upon realizing this, Mr. Contreras took two actions: he attempted to stop payment, and he reported the matter to his supervisor. On April 14th, he instructed JHS financial personnel to “not pay any invoices for Trinity until further notice.”¹¹⁸ And Mr. Contreras reported the mistake in person to Mr. Steigman, no later than the morning of April 14th. The precise chronology of these events is unclear, but both actions occurred less than three days after Mr. Contreras mistakenly approved the invoices and within hours of each other. The insinuation that Mr. Contreras attempted to conceal his actions is not supported by the record.

4. Assertion that Trinity Was Not Required to Bill Insurance

a. *OIG Assertion*

Commenting on JHS’ request that Trinity refund the payments, the OIG stated as follows: “As a practical matter, if Trinity were to refund the payments, the vendor would then have to negotiate with multiple insurance carriers, including Medicaid and Medicare, to recover the costs of the air ambulance services paid by JHS.”¹¹⁹ The insinuation is that Trinity should not have to take these steps but, rather, was entitled to retain the payments from JHS.

b. *Response*

The steps that the OIG describes in this statement reflect precisely the procedure that a health care vendor should follow. Air ambulance transport is a health care service that is payable, or not, based on the patient’s insurance benefit package. As discussed above, to receive payment for this service, the air ambulance company must submit a claim to the patient’s insurance company. If the insurer does not cover, or only partially covers, the service, depending on the patient’s insurance plan, the vendor may be able to balance bill the patient, if permitted under applicable state law. For patients with federal health insurance, the vendor may not invoice the hospital, because such an arrangement could be viewed as a kickback, and federal regulations

¹¹⁸ Email from Mr. Contreras to Mr. Figueroa and Mr. Clark, 4/14/16.

¹¹⁹ OIG draft report, at 48.

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require health care providers and suppliers participating in Federal health insurance programs to submit claims to the appropriate administrative contractor.¹²⁰

5. Recommendation That JHS Disclose This Matter to HHS-OIG

a. *OIG Recommendation*

Finally, OIG recommends that “JHS and OCE reconsider disclosing the Trinity proposal, inbound transports, and payments to HHS-OIG.”¹²¹

b. *Suggested Response*

Disclosure to HHS-OIG of this matter is not required under the law or appropriate based on the facts. The mechanism for a health care provider to communicate potential regulatory or legal violations to HHS-OIG is the OIG’s Provider Self-Disclosure Protocol (“SDP”).¹²² The SDP was promulgated to “establish a process for health care providers to voluntarily identify, disclose, and resolve instances of potential fraud involving the Federal health care programs . . .”¹²³ A provider is encouraged to utilize the SDP if it identifies matters “that, in the provider’s reasonable assessment, are potentially violative of Federal criminal, civil, or administrative laws.”¹²⁴ If JHS believed that the Trinity arrangement violated the AKS, disclosure to HHS-OIG under the SDP would be appropriate. However, as discussed herein, we cannot conclude, based on the record, that either JHS or Trinity acted with the requisite intent under the AKS; *i.e.*, with an understanding that the actions at issue were unlawful. Because we cannot conclude that the matter at issue was “potentially violative of Federal criminal, civil or administrative laws,” disclosure to HHS-OIG under the SDP is not warranted.

While we do not believe that disclosure to HHS-OIG is appropriate, we note that JHS repaid to CMS all payments for services rendered to Medicare patients at issue. We do not believe that JHS was required under the law to repay these funds, but we understand why, out of an abundance of caution, JHS would make this business decision, and more is not required.

¹²⁰ 42 U.S.C. § 1395w-4(g)(4)(A).

¹²¹ OIG draft report, at 49.

¹²² See 63 Fed. Reg. 58399, 58401 (Oct. 30, 1998).

¹²³ See U.S. Dept. of Health & Human Servs. Office of Inspector General, “OIG’s Provider Self-Disclosure Protocol” (Apr. 17, 2013), available at <https://oig.hhs.gov/compliance/self-disclosure-info/files/Provider-Self-Disclosure-Protocol.pdf>

¹²⁴ *Id.*