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April 13, 2012

Comment on DSHS/HCA “Pathways to Health” proposal

Dear Duals Project Team:

Vancouver Fire Department (VFD) only recently learned of the *Pathways to Health: Medicare and Medicaid Integration in Washington State* proposal and would like to provide comment. The short timeline for our response precludes being able to develop the consensus statement between regional or statewide fire/EMS agencies that we would otherwise have tried to achieve. However, it is likely that the same issues which confront VFD are also of concern to fire and Emergency Medical Service (EMS) agencies across the state.

The basic intent of our comment is to remind health system planners that EMS providers are health care providers who can bring great value in the effort to integrate care, whether the integration desired is “vertically” amongst health care providers or “horizontally” between social services and other providers who influence the social determinants of health.

The EMTs and paramedics employed by public and private agencies are on the frontlines of the health care system delivering basic and advanced level care in people’s homes and on the streets of our communities. Efforts to improve quality by encouraging cooperation between health care agencies will be more successful if EMS is included up front in the strategic planning. Efforts to reduce unnecessary admissions to the Emergency Department (ED) will be more likely to succeed if we plan for changes in the way that EMS systems, including 911 call centers, interact with patients and with other health care providers.

Currently EMS providers typically have few options other than transporting a patient to the ED. Once a patient places a call to 911 we have a duty to respond. Once on scene we assess and treat patients without regard to ability to pay. Unless a patient signs a refusal

of service form they are transported to the ED where evaluation is then of course mandated by federal law (EMTALA). We are aware that in many cases this system contributes to an inappropriate use of resources.

VFD employs over 100 EMTs and 65 paramedics. We are first responders to over 20,000 calls per year serving a population of almost 250,000. We work in partnership with the contracted private ambulance service for Clark County EMS District #2 which is governed by the County Commissioners. Both EMS District #2 and VFD are currently engaged in Strategic Planning processes to determine how to best deploy our resources in the face of ever increasing demand and within tight budgetary constraints. We are considering innovative changes and are open to partnering with other health system organizations in an effort to improve quality and contain costs.

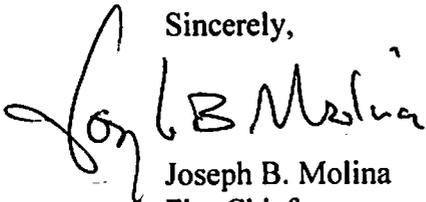
Also, both EMS District #2 and VFD are involved with the organization of the Regional Health Alliance. Changes to the 911 call-taking processes are part of the RHA's "Innovations" grant application to CMS. These changes would help direct patients to resources other than transport to the ED when appropriate.

VFD has developed innovative partnerships in the past. For example, our "Older Persons are Important" program focused on fall injury prevention as we partnered with Adult Protective Services and the Area Agency on Aging. This was a collaboration to prevent unnecessary and costly injuries.

VFD and other EMS agencies could play a significant role in the effort to better meet the needs of dual eligible and other chronic disease patients. We would encourage more explicit consideration of EMS providers and 911 call centers in your Pathways to Health proposal. We were unable to find mention of EMS, 911, ambulance, EMT or paramedic in the draft 75 page document. We suggest that collaboration with EMS providers should be a priority for health plans and health providers. Health Homes would be well advised to have agreements with EMS providers in the areas they serve.

As a provider of emergency health services Vancouver Fire Department stands ready to engage with organizations that understand our dedication to the community we serve and our willingness to explore innovative health system reform in the effort to improve quality and control overall system cost.

Sincerely,

A handwritten signature in black ink that reads "Joseph B. Molina". The signature is written in a cursive style with a large, looping initial "J".

Joseph B. Molina
Fire Chief
Vancouver Fire Department