We at Ambiance would first like to thank the Department and the Committee for their efforts to improve the availability and quality of NEMT services afforded the citizens of Los Angeles City. As background, Ambiance is a company with over 20 NEMT permits, provides primarily NEMT gurney services and employs ~60 individuals, over 30 of whom are EMTs. We do not provide ALS or BLS service. Following are our thoughts and requests regarding the Department’s recommendation to and discussion with the Committee regarding Board Order 598:

1. While we do not necessarily believe an EMT is warranted as an attendant during transports, we have found (and our clients appreciate) the professionalism that is exhibited by individuals who have invested the time and money necessary to obtain an EMT certification and have a desire to have a career in healthcare is significantly greater than that exhibited by individuals who are seeking a minimum wage position that requires no investment. Based upon our employment & hiring experiences we do not agree with the comments made during the last hearing that there is an EMT “shortage”. Rather, there is a shortage to hire EMTs at the rates necessary to profitably provide NEMT transportation services at the rates LADOT has established for private pay transports in LA City and the rates being paid by LA Care and others. We feel the current situation is a rate issue, not an EMT hiring issue. To cite a common phrase - you get what you pay for.

2. We are requesting that the revised board order be revised to ensure that companies hiring EMTs not be disadvantaged in the permitting process by making it clear that:
   a. an EMT certificate will be sufficient for permitting rather than needing an EMT to go take the CPR and First Aid course; and
   b. there will no longer be a requirement for EMTs to submit a DL-51 as a part of attendant permitting since other attendants do not have to submit this.

3. We would also suggest that the board order be modified to address situations that are out of the ordinary that represent a
small percentage of total NEMT transports but represent disproportional risks:

a. **PERSONNEL FOR TRANSPORTING BED-BOUND PATIENTS REQUIRING ADMINISTRATION OF OXYGEN** - These patients, unlike wheelchair patients, do not self-administer their oxygen during transport.

**REQUEST:** Require EMT attendants when transporting bed-bound patients requiring oxygen.

b. **PERSONNEL FOR TRANSPORTING PATIENTS REQUIRING ISOLATION** - In order to prevent the spread of the issue requiring isolation, these patients need to be handled appropriately to protect the individuals performing the transport and the vehicle & equipment needs to be sanitized properly. Failure to perform this appropriately puts subsequent patients at risk of contagion. EMTs are trained in these techniques and the standard First Aid and other required minimum training do not cover this issue.

**REQUEST:** Require EMT attendants when transporting patients requiring isolation and address the rates that can be charged for such transports.

c. **PERSONNEL FOR TRANSPORTING BED-BOUND BARIATRIC PATIENTS** - Bariatric patients weigh between 250 and 300 pounds and require the correct equipment (e.g. - transfer boards, electric stair chairs & electric gurneys) and trained personnel to safely provide this type of transportation. In addition, bed-bound patients who are bariatric require a higher level of care during transport.

**REQUEST:** Require the above equipment when transporting bed-bound bariatric patients and address the rates that can be charged for such transports.

d. **PERSONNEL FOR TRANSPORTING BED-BOUND BARIATRIC+ PATIENTS** - These are patients weighing in excess of 300 lbs. up to 500 lbs. In addition to the equipment required for bed-bound bariatric patients, power loads significantly reduce the risk of injury to both the patient and personnel when transitioning in and out of the vehicle. This transition is the point where the gurney legs are raised while one end of the gurney rests in the vehicle and the patient is balanced and supported by the crew alone. Performing this task with additional personnel reduces the risk but not to the level of a power loader.
REQUEST:  Require a power load, in addition to the equipment for bariatric patients, for transporting patients weighing over 300 pounds and address the rates that can be charged for such transports.

The above supplements, along with the change to the EMT requirement, would address “edge case” patients (bariatric, bariatric+, isolation & oxygen patients) who represent a small percentage of NEMT gurney transports yet are some of the most vulnerable NEMT patients and there are sufficient companies to serve these “edge case” patients.

I hope you will take these comments in the constructive light they are given. As always, we at Ambiance will make ourselves available to the Department and the Committee.

Michael P. Borom
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(203) 246-6335

Jasmin San Luis <jasmin.sanluis@lacity.org>
To: IRENE SAE KOO <irene.saekoo@lacity.org>
Cc: Jarvis Murray <jarvis.murray@lacity.org>

Hi Irene,
We would need to agendize this for the June 8th agenda as a response to the objection notice.

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Jasmin San Luis
Executive Administrative Assistant III
Executive Office

Los Angeles Department of Transportation
213.972.8448
Hi Michael and Jonathan,

Please see the email below from Mr. Borom in response to the filing objection to BO 598. The notice was published on May 5th and the email was sent May 16th. Based on the notice procedure for filing objections highlighted below, can we still accept the objection? I wanted to double check.

"...The Secretary of the Transportation Commission shall publish once in the official newspaper, a certified copy of every proposed regulation tentatively approved by the Commission, together with a notice to any and all persons to show cause, if any, within five days from the date of publication of the notice, why the proposed regulation should not be made effective. Any persons interested in or affected by the proposed regulation may, within five days after the expiration of the publication, file objections with the Secretary of the Transportation Commission, specifying the grounds of the objections. The Secretary shall place all objections on the Transportation Commission’s agenda for its next regular meeting after the expiration of the time for filing the objections, and the Commission shall then fix a date, not less than five days later, for hearing any and all objections, and shall, after the hearing, finally act on the proposed regulation by approving, changing or rejecting it, providing that any resolution of the Transportation Commission approving any regulation shall be published once before becoming effective and shall be subject to the referendum provisions of the Charter relating to ordinances..."

-------- Forwarded message --------
From: Michael Borom <mborom@ambiancetrans.com>
Date: Tue, May 16, 2023 at 11:53 AM
Subject: Revision to BO 598
To: jasmin.sanluis@lacity.org <jasmin.sanluis@lacity.org>
Cc: Jarvis Murray <jarvis.murray@lacity.org>, Irene Sae Koo <irene.saekoo@lacity.org>

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[Quoted text hidden]

Jasmin San Luis <jasmin.sanluis@lacity.org>  
To: Michael Nagle <michael.nagle@lacity.org>, Jonathan Groat <jonathan.groat@lacity.org>  

Hi Michael and Jonathan,

Please disregard my previous email. I will just add it to the agenda for the June 8th meeting.

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