

Stephen M. Wontrobski
27132 Sombras
Mission Viejo, CA 92692

September 11, 2014

Mrs. Tammi McConnell, Program Manager
Orange County Emergency Medical Services
405 W. Fifth Street, Suite 301A
Santa Ana, CA 92705

Ref: Proposed Ambulance Ordinance

Dear Ms. McConnell:

In a continuing effort to insure full EMCC disclosure to the public on the Ambulance Transport RFP, I previously requested that the following provision be included in the ambulance transport contract.

“Bidder is required to identify on all invoices for service, the specific dollar amount that will be rebated to the OCFA.”

The reasons given for including this clause were:

1. Full disclosure to the public that are being billed.
2. Full disclosure to insurance companies and governmental reimbursement agencies, such as Medicare.
3. As a matter of conscience or religious belief, if an ambulance company does not believe it is right or ethical to “bury” rebate charges, it risks a possible OCFA backlash, if it does so.
4. Removal of OCFA retaliation threat.

My comments on the subject proposed ambulance ordinance are divided into two parts:

1. Customer Complaints
2. Invoice Billing

Customer Complaints

My prior review of OCFA customer complaints revealed that customer complaints were not being transmitted by the OCFA as required to the Orange County Health Care Agency.

I recommend that Paragraph 4.9.15, Complaints, be amended to read that all paramedic provider agencies and ambulance transport providers must provide a copy of customer complaints they receive to the Medical Director within 7 days of receipt of the complaint.

Invoice Billings

I recommend that for ambulance transport invoice billings, the following comments be added.

1. If an ambulance company elects to bill the ALS providing agency rebate fee to a customer, it must separately break out the charge on its invoice.
2. Ambulance companies are not required to bill out the ALS rebate fee to its customers. If the ambulance provider decides not to bill out the charge, the ALS providing agency, must do its own separate billing, if it deems the charge is warranted.

From conversations with Mission Viejo residents, I have yet to come across any individual who was aware of ALS rebates being buried in ambulance transport invoices, which were later rebated to the OCFA. In fact, members of the Mission Viejo City Council themselves were unaware of this practice.

As it currently stands, it appears to some that the OCFA, Ambulance companies, and the Health Care Agency are acting together in a scheme to deprive the public of knowledge of the existence of the ALS rebate billing practice.

There is no question that the OCFA is a very powerful organization and is politically very well connected. However, the Health Care Agency and County officials primary and first responsibility is the protection of the public. Adding the above comments to the proposed ordinance will go a long way to achieving that responsibility.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen M. Wontrobski". The signature is fluid and cursive, with a horizontal line extending from the end.

Stephen M. Wontrobski

cc: Office of the State EMSA
Orange County Board of Supervisors

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