

SUBJECT: **AMBULANCE LICENSING INVESTIGATIONS**

REFERENCE NO. 453

PURPOSE: To outline a process for investigating complaints about, or violations related to, licensed ambulance operations

AUTHORITY: Los Angeles County Code, Title 7, Business Licenses, Ambulance Ordinance 7.16.020
Health & Safety Code 1797.170, 1797.172, 1797.204, 1797.224
California Code of Regulations, Title 22, Sections 100062, 100063, 100145, 100169

PRINCIPLES:

1. Ambulance transport is an essential healthcare service and the public depends on the system's integrity and quality when they are sick or injured.
2. Any complaint, including anonymous complaints, received by the EMS Agency will be reviewed and, if appropriate, investigated to determine if a violation has occurred
3. Investigations are initiated based on tips from citizens, EMS providers, healthcare facilities, etc., or they may result from direct observations or audits by an enforcement officer.
4. All investigation documents and associated materials are confidential and cannot be obtained with a public record request. The EMS Agency will make every possible effort to maintain the confidentiality of informants.

POLICY:

I. Initiation of an Investigation

- A. Any private citizen, patient, provider agency personnel or healthcare facility personnel believe, or has reason to believe, that inadequate services were provided or that they have observed an ambulance operator commit violations of the Los Angeles County Code (County Code) or any other applicable federal, state or local rules, regulations and laws, including Los Angeles County prehospital care policies, may submit a request for an investigation to the EMS Agency.

1. The inquiry must set forth the allegations in writing and shall be submitted as follows:
 - a. On a Los Angeles County EMS Agency Situation Report (preferred method and the form can be found on the EMS Agency website at <http://ems.dhs.lacounty.gov/AmbulanceLicensing/AmbLic.htm>) which may be mailed to the address listed for item (c.) below, or completed and submitted online; or

EFFECTIVE: 10-01-12

PAGE 1 OF 4

REVISED:

SUPERSEDES:

APPROVED:



Director, EMS Agency



Medical Director, EMS Agency

- b. Sending an e-mail to ambulanceviolations@dhs.lacounty.gov; or
- c. Sending a letter addressed to:

Los Angeles County EMS Agency
ATTN: Ambulance Programs Section
10100 Pioneer Blvd., Suite 200
Santa Fe Springs, CA 90670

- 2. The EMS Agency shall notify the ambulance operator identified in the complaint and will provide all relevant non-confidential information related to the allegations received. However, the complaint source will not be identified at any time during or after the investigation process.
- B. Investigations may also be initiated by a designated enforcement officer (refer to Reference No. 456.1, Ambulance Licensing Enforcement Officers) if they believe, or have reason to believe, that inadequate services were provided by an ambulance operator.
- 1. If an enforcement officer observes a violation of the County Code, or any other applicable federal, state or local rules, regulations or laws, including Los Angeles County prehospital care policies, a Notice of Violation may be issued and further investigation is not required (Refer to Reference No. 451, Ambulance Licensing Notices of Violation and Administrative Fines).
 - 2. The Notice of violation may specify a correction period if, in the enforcement officer's judgment, a correction period is warranted.
- C. Investigation Procedures
- 1. The EMS Agency shall independently investigate and verify, if possible, the allegations described in the complaint. Techniques and information sources that may be utilized as part of the investigation process include, but are not limited to, the following:
 - a. EMS Agency records
 - b. Patient care records
 - c. Personnel interviews
 - d. City and county business license records
 - e. Law enforcement records
 - f. Secretary of State records
 - g. Internet / websites / social media
 - h. Telephone directories
 - i. Previous investigation records
 - j. Onsite inspection and/or surveillance
 - k. Other EMS providers
 - l. Investigations from other agencies
 - m. Newspaper and/or magazine articles

2. Personnel interviews may be part of the investigation process when indicated and such interviews will be coordinated and scheduled with the ambulance operator associated with the complaint.
3. The written complaint and all pertinent documents and information obtained shall be reviewed for potential violation of the County Code, or any other applicable federal, state or local rules, regulations or laws, including Los Angeles County prehospital care policies.
4. EMS Agency enforcement officers and staff shall review all available information and prepare a written report to include:
 - a. Identification of the information sources reviewed and/or individuals interviewed.
 - b. A brief description of the violation or incident and the allegations submitted and/or observed and a summary of the findings of the investigation. Identification of the specific sections of the County Code or regulations violated and/or the specific prehospital care policy violated, if applicable is also included as part of the findings.
 - c. Recommended actions as a result of the investigation, e.g. issue a Notice of Violation, personnel education, policy changes, refer to other regulatory agency, etc.

D. Investigation Outcomes

1. If the allegations are not verified or found to be accurate, the complainant and the ambulance operator/ambulance personnel investigated shall be notified of the outcome and no further action is indicated.
2. If the allegations are verified and a violation is identified as outlined in Reference No. 451, Ambulance Licensing Notices of Violation and Administrative Fines and Reference No. 451.1, Ambulance Licensing Administrative Fines, a Notice of Violation will be issued and, if applicable, a Notice of Administrative Fine.
3. When indicated, complaints will also be referred to other appropriate regulatory agencies for follow-up, e.g., other local EMS Agency, Medicare, law enforcement, Office of Prehospital Certification, etc.

CROSS REFERENCES:

Prehospital Care Manual:

- Ref. No. 450, **Los Angeles County Code, Title 7, Business Licenses (Ambulance Ordinance)**
- Ref. No. 451, **Ambulance Licensing Notices of Violation and Administrative Fines**
- Ref. No. 451.1, **Ambulance Licensing Administrative Fines**
- Ref. No. 451.2, **Notice of Violation – Administrative**
- Ref. No. 451.3, **Notice of Violation - Operational**
- Ref. No. 451.4, **Notice of Violation - Personnel**
- Ref. No. 452, **Ambulance Licensing Administrative Fine Hearing Process**
- Ref. No. 453.1 **Ambulance Enforcement Officers**