



State of New Jersey
DEPARTMENT OF HEALTH
OFFICE OF EMERGENCY MEDICAL SERVICES
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CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

www.nj.gov/health

CATHLEEN D. BENNETT
Commissioner

September 29, 2017

Muhammad Alkhulani
Ever Ready Medical Response
553 East Jersey Street
Elizabeth, NJ 07206

Re: **Notice of Proposed Revocation and Assessment of Penalties:
Mobility Assistance Vehicle / Basic Life Support Service Provider
Investigation Control # 2017-0022V**

Dear Mr. Alkhulani:

The New Jersey Department of Health (Department) is vested with the responsibility of carrying out the provisions of the Health Care Facilities Planning Act, N.J.S.A. 26:2H-1 et seq., which was enacted, in part, to ensure that hospital and related health care services rendered in New Jersey are of the highest quality. As defined at N.J.S.A. 26:2H-2b, health care services include pre-hospital basic life support (BLS) ambulance services. Furthermore, N.J.S.A. 26:2H-5 grants the Commissioner of Health the power to inquire into health care services and to conduct periodic inspections with respect to the fitness and adequacy of the equipment and personnel employed by those services. Even more, the New Jersey Medical Assistance and Health Services Act, N.J.S.A. 30:4D-1, et seq., requires the Department to establish the requirements for the equipment, supplies, and vehicles of providers of mobility assistance vehicle services. See N.J.S.A. 30:4D-6.4. In furtherance of each of the aforementioned statutory objectives, the Department adopted regulations that govern the licensure and inspection of basic life support ambulance (BLS) and mobility assistance vehicle (MAV) service providers and their vehicles. Those regulations are set forth in their entirety at N.J.A.C. 8:40-1.1 et seq.

Ever Ready Medical Response ("Ever Ready") is licensed through December 31, 2018 to provide Mobile Assistance Vehicle (MAV) and Basic Life Support (BLS) services. Currently, Ever Ready has three MAV and three BLS vehicles licensed with the Department. On March 10, 2017, your provider license was summarily suspended. For the reasons stated below, the Department now proposes to revoke your MAV and BLS

licenses; in addition, the Department proposes an assessed penalty against you in the amount of \$166,750.00.

As you know, on January 27, 2017, an unannounced spot check was conducted on Ever Ready BLS Vehicle #07 in South Orange, New Jersey by an OEMS investigator. You were the only EMT staffing the BLS vehicle, in violation of N.J.A.C. 8:40-6.3. Pursuant to N.J.A.C. 8:40-6.3, each in-service BLS licensed ambulance must be staffed with a minimum of two EMTs. Two EMTs are required to staff a BLS vehicle because the collective duties of the crewmembers include:

3. Providing the patient with prompt, effective and appropriate medical care;...
6. Assuring that the patient is attended to by at least one crewmember at all times;
7. Continually monitoring the patient's condition and equipment;...
10. Supervising the well-being of the patient and ensuring the patient's privacy and comfort." N.J.A.C. 8:40-6.4.

When a BLS vehicle fails to maintain the minimum two crewmember requirement, the provider is failing to fulfill the above referenced duties. While one EMT drives the BLS vehicle, the other EMT is monitoring the patient's condition and providing prompt and effective care. Failing to comply with the minimum crewmember requirement places patients' health, safety and welfare at risk. You were the only EMT staffing BLS Vehicle #07. Ever Ready's failure to properly staff the vehicle placed patients' health, safety and welfare at risk. Even more, the one EMT staffing the vehicle did not have a valid Cardiopulmonary Resuscitation (CPR) certification, in violation of N.J.A.C. 8:40-3.8.

Furthermore, the transported patient was sitting in the front seat of the vehicle with his/her wheelchair left unsecured in the back of the ambulance, rather than having the patient transported via a stretcher, as required by N.J.A.C. 8:40-4.4(f) and N.J.A.C. 8:40-6.8(d). Wheelchairs may not be transported in a BLS vehicle while it is "in-service." See N.J.A.C. 8:40-6.8(d).

In addition, OEMS documented the following vehicle deficiencies relating to Vehicle #07: (1) the vehicle registration was expired, in violation of N.J.A.C. 8:40-4.3; (2) the oxygen cylinders, reeves stretcher and jump bag were unsecured and not crashworthy, in violation of N.J.A.C. 8:40-4.4(d)(7); (3) multiple expired pieces of equipment and supplies were in the vehicle, including glucose and hydrogen peroxide that expired in 2015, in violation of N.J.A.C. 8:40-6.5; and (4) the vehicle was unsanitary with soiled linens, used gloves, used oxygen tubing, empty beverage containers and trash throughout the vehicle, in violation of N.J.A.C. 8:40-4.5.

N.J.A.C. 8:40-7.2(a) states "[a]n authorized representative of the Department may remove any or all of a provider's vehicles from service when, in his or her opinion, the vehicle, equipment or crewmembers pose an imminent threat to the health, safety or welfare of the public or to patients using the service." As a result of your failure to maintain minimum crewmember requirements, failure to properly transport a patient, and

several other violations cited above, OEMS placed Vehicle #07 on a Department Initiated Out of Service (DIOOS) status, pursuant to N.J.A.C. 8:40-7.2(a).

On February 2, 2017, OEMS conducted an unannounced audit of Ever Ready at your place of business on East Jersey St. in Elizabeth, New Jersey. Upon arrival, investigators advised you that they needed access to the following: (1) patient care reports; (2) standard operating procedures; (3) certificate of liability insurance; (4) staff roster; and (5) staff credentials. You were also asked to start rotating any vehicles that were in the field back to the station in order to facilitate the inspection process of the vehicles.

Throughout the inspection, OEMS discovered a number of serious violations, which threaten the health, safety, and welfare of the public. First, the investigators discovered that Ever Ready has failed to maintain the minimum crew requirement on 126 separate transports between August 30, 2016 to January 19, 2017, in violation of N.J.A.C. 8:40-6.3. Second, Ever Ready failed to create and maintain patient care reports for patients between August 30, 2016 to January 19, 2017, in violation of N.J.A.C. 8:40-3.6. Third, three staff members did not have required Mobility Assistance Vehicle – Technician (MAV-T) credentials, CPR certificates, and/or a valid driver's license, in violation of N.J.A.C. 8:40-3.8. Lastly, the six vehicles you operate were all placed on DIOOS status because of the multitude of serious vehicle deficiencies found. Below is a detailed description of each violation cited during the February 2nd inspection.

Failure to Maintain Minimum Crew Requirement in violation of N.J.A.C. 8:40-6.3:

As stated above, N.J.A.C. 8:40-6.3 requires a BLS ambulance to be staffed with a minimum of two EMT. Despite being advised on January 29, 2017 that Vehicle #7 was being placed on DIOOS status, in part, because you failed to staff the vehicle with two EMTs, you advised OEMS investigators that you did not realize you were required to staff a BLS vehicle with two EMTs. You provided OEMS investigators with Logisticare log sheets, which contained both BLS and MAV transports. Logisticare is a third-party contractor hired by Medicaid to manage the transport of its patients. You confirmed that the log sheets reflected the complete crew for each transport. OEMS investigators conducted an extensive review of the Logisticare log sheets and created a spreadsheet to document the instances when Ever Ready transported patients in a BLS vehicle with only one EMT. The spreadsheet shows that between August 30, 2016 and January 19, 2017, Ever Ready transported patients with only one EMT in 126 separate instances, in violation of N.J.A.C. 8:40-6.3. See enclosure.

Failure to Maintain Patient Care Reports in violation of N.J.A.C. 8:40-3.6:

Ever Ready failed to create and maintain patient care reports, in violation of N.J.A.C. 8:40-3.6. Pursuant to N.J.A.C. 8:40-3.6, a provider is required to develop a patient care report to be utilized each time a crewmember makes physical or verbal contact with a patient.

1. A separate patient care report shall be prepared for each patient transported in the same vehicle. One patient care report, per person shall be completed. A separate patient care report shall be completed for each leg of a round trip transport.

2. A patient care report shall be signed by all of the crewmembers;...

- e. The provider shall keep all patient care reports in accordance with the provisions for the retention of records set forth at N.J.A.C. 8:40-3.9.”
N.J.A.C. 8:40-3.6.

Patient care reports contain the following information: patient’s name; description of the patient’s condition at the scene and in transit; chief complaint; vital signs; and a description of care provided to the patient at the scene and in transit, inter alia. See N.J.A.C. 8:40-3.6. The provider is also required to provide a copy of the patient care report to the receiving health care facility. Id.

You advised OEMS investigators that Ever Ready does not create any patient care reports. You stated that you do not keep patient care reports because Logisticare only requires a log sheet that the patients need to sign at the time of service. You stated that the log sheet is completed by the driver for the day, listing the vehicle being used and the trips they completed. OEMS investigators conducted an extensive review of the Logisticare log sheets and created a spreadsheet to document the instances when Ever Ready transported a patient and failed to create a patient care report. The spreadsheet shows that between August 30, 2016 to January 19, 2017, Ever Ready failed to create and/or maintain patient care reports for patients it transported, in violation of N.J.A.C. 8:40-3.6. See enclosure.

Failure to Maintain Employee Credentials in violation of N.J.A.C. 8:40-3.8

Pursuant to N.J.A.C. 8:40-3.8, “[a] provider shall maintain a personnel file for each crewmember. Each file shall contain, at a minimum: (1) the name and home address of the crewmember; (2) a copy of the crewmember’s valid driver’s license; (4) a copy of the crewmember’s PAT Technician, MAV Technician or EMT certification card, as applicable; and (5) a copy of the crewmember’s CPR certification card.” During the inspection, Ever Ready failed to produce the following required employee credentials:

1. Crew member, I.A., did not have a current MAV-T certification or CPR certification, in violation of N.J.A.C. 8:40-3.8;
2. Crew member, H.A., did not have a current MAV-T certification (only a temporary letter on file), in violation of N.J.A.C. 8:40-3.8; and
3. Crew member, I.H., did not have a valid driver’s license, in violation of N.J.A.C. 8:40-3.8.

Vehicle Deficiencies:

OEMS investigators inspected MAV Vehicle #10 and documented the following deficiencies:

1. The jump kit holding the oxygen cylinder contained medical supplies, such as ventilation equipment, that are outside the scope of practice for a Mobility Assistance Vehicle Technician (MAV-T), in violation of N.J.A.C. 8:40-5.2(b)(5);

2. The jump kit holding the oxygen cylinder was laying between the two front seats and not secured in a commercial device, in violation of N.J.A.C. 8:40-6.6(a)(6);
3. There was no CPR mask or flashlight, in violation of N.J.A.C. 8:40-5.5(b) and N.J.A.C. 8:40-4.4(h)(1);
4. Multiple items were uncrashworthy and a safety violation, including engine coolant in the overhead compartment; exposed wires on the lift; the manual lift bar was laying on the floor; and a wheelchair was held by a bungee cord, in violation of N.J.A.C. 8:40-4.4;
5. The heat in the rear of the vehicle was non-functional, in violation of N.J.A.C. 8:40-4.6;
6. The fire extinguisher was uncharged and not secured, in violation of N.J.A.C. 8:40-4.4(h)(2); and
7. The interior of the vehicle was unsanitary making it unsafe and a risk to public health, in violation of N.J.A.C. 8:40-4.5.

Due to the severity of the infractions, OEMS investigators placed MAV Vehicle #10 on a DIOOS status.

OEMS investigators observed that Vehicle #03 had been involved in a motor vehicle accident where it sustained extensive damage to the driver side as it had an approximately six-inch intrusion. You advised that Vehicle #3 was involved in an accident in the Fall of 2016. N.J.A.C. 8:40-3.7(a)(2) requires MAV and BLS providers to report accidents involving their vehicles to OEMS. You admitted that you failed to report the accident to OEMS. Because of the poor condition of the vehicle, investigators placed Vehicle #03 on a DIOOS status.

Next, OEMS Investigators inspected BLS Vehicle #04 and documented the following deficiencies:

1. The main oxygen cylinder was empty, in violation of N.J.A.C. 8:40-6.6(a)(4);
2. The vehicle was missing portable oxygen, in violation of N.J.A.C. 8:40-6.5;
3. The portable suction was inoperable, in violation of N.J.A.C. 8:40-6.7;
4. The stretcher locking mechanism did not close making the stretcher unable to be properly secured, in violation of N.J.A.C. 8:40-4.4(e)(7);
5. The vehicle was missing multiple pieces of equipment, including Hare Traction and a vest-type upper spinal immobilization device (such as a Kendrick Extrication Device (KED)), in violation of N.J.A.C. 8:40-6.5;

6. A large container of diesel fuel was found in the side compartment and an automotive alternator was found in the outside compartment behind the driver's seat, in violation of N.J.A.C. 8:40-4.4;
7. The vehicle maintained multiple expired items, such as escape respirators that expired in 2009, an obstetrician kit that expired in 2016, and sterile water that expired in 2011, in violation of N.J.A.C. 8:40-6.5;
8. The exhaust pipe did not extend past the body of the truck, in violation of N.J.A.C. 8:40-4.8;
9. The marker light near the right rear tire was missing, in violation of N.J.A.C. 8:40-6.11 and N.J.A.C. 8:40-6.12(f);
10. The heat was not functional in the rear patient compartment, in violation of N.J.A.C. 8:40-4.6;
11. The vehicle was improperly registered, in violation of N.J.A.C. 8:40-4.3;
12. A large piece of tread was missing from the right rear tire, in violation of N.J.A.C. 8:40-4.4 and N.J.A.C. 8:40-4.7(c);
13. The vehicle was missing a front license plate, in violation of N.J.A.C. 8:40-4.3; and
14. The interior of the vehicle was unsanitary with moldy burn sheets and rotting food, in violation of N.J.A.C. 8:40-4.5.

Due to the severity of the infractions, investigators placed BLS Vehicle #04 on a DIOOS status.

During the audit on February 2, 2017, OEMS investigators continuously asked you for the status of the other vehicles that were ordered to return to the station for inspection. You continuously advised that the vehicles were only twenty minutes away. OEMS investigators waited over two and a half hours for the vehicles to return to the station after their initial request. After waiting two and a half hours, investigators advised that you were hindering an OEMS investigation, in violation of N.J.A.C. 8:40-2.6(c), as you were preventing investigators from inspecting the remaining vehicles. The remaining vehicles were placed on a DIOOS status because they could not be inspected. You were advised that the vehicles would need to be inspected by OEMS staff prior to being used.

On March 3, 2017, you presented Vehicle #07 for a re-inspection in an attempt to place it back in service; however, Vehicle #07 again failed the inspection and it remained out-of-service. On March 10, 2017, a summary suspension was issued against your MAV and BLS licenses due to the severity of the cited issues and the threat the violations posed to the public health, safety, and welfare. On April 6, 2017, your attorney, Hassen Ibn Abdellah, Esq., requested an emergent hearing on your behalf. On June 28, 2017, you presented Vehicles #01 and #07 for re-inspection; again, the vehicles failed inspection and remained out-of-service. On August 14, 2017, Hassen Ibn Abdellah, Esq.

advised the Honorable Elissa Testa, A.L.J. that you have withdrawn the pending motion for emergent relief.

Assessed Penalties:

N.J.A.C. 8:40-7.2(e) states, “In accordance with N.J.S.A. 26:2H-14, the Department may impose monetary penalties for violation of any of the rules contained in this chapter, including, but not limited to, the violations noted below, as follows:

3. Violations of any rule pertaining to minimum crewmember requirements, crewmember duties, crewmember training and/or certification requirements shall result in a monetary penalty of \$1,000 per violation/per calendar day;
4. Violation of any rule pertaining to patient, passenger and/or crewmember restraint or the safe transport of patients or passengers that do not result in injury, but have the potential to cause injury shall result in a monetary penalty of \$1,000 per violation/per calendar day;...
7. Violation of the rules requiring portable oxygen and portable aspirator/suction devices shall result in a monetary penalty of \$1,000 per violation/per calendar day;...
9. Violations of the remaining portions of these rules may result in a monetary penalty of \$250.00 per violation/per calendar day.

N.J.A.C. 8:40-7.2(f) states, “Violations shall be considered as a single, different occurrence for each calendar day the violation occurs or remains uncorrected.”

Based upon the above cited deficient practices, OEMS hereby proposes an assessed penalty against Ever Ready in the amount of \$166,750.00, in accordance with N.J.A.C. 8:40-7.2(e). The assessed penalty amount for each violation is as follows:

<u>Violation</u>	<u>Regulation</u>	<u>Penalty</u>
Failure to properly transport a patient	N.J.A.C. 8:40-4.4	\$250.00
Failure to properly staff a BLS vehicle with two crewmembers (\$1000 x 126 instances; see enclosed spreadsheet documenting each violation)	N.J.A.C. 8:40-6.3 & N.J.A.C. 8:40-7.2(e)(3)	\$126,000.00
Failure to complete patient care reports (\$250 x 126 instances; see enclosed spreadsheet documenting each violation)	N.J.A.C. 8:40-3.6 & N.J.A.C. 8:40-6.4(a)(13)	\$31,500.00
Failure to maintain required credentials in personnel files	N.J.A.C. 8:40-3.8	\$250.00
Failure to report a motor vehicle accident for Vehicle #3	N.J.A.C. 8:40-3.7(a)	\$250.00
Hindering an investigation	N.J.A.C. 8:40-2.6(c)	\$250.00
Vehicle #10 Violations		
Maintaining medical supplies outside the scope of practice, i.e. ventilation equipment,	N.J.A.C. 8:40-5.2(b)(5);	\$250.00

Improper portable oxygen restraint	<u>N.J.A.C. 8:40-6.6(a)(6)</u> & <u>N.J.A.C. 8:40-7.2(e)(7)</u>	\$1000.00
Required items were not found: CPR mask and flashlight	<u>N.J.A.C. 8:40-5.5(b)</u> & <u>N.J.A.C. 8:40-4.4(h)(1)</u>	\$250.00
Multiple items were uncrashworthy, including engine coolant, the lift bar, and a wheelchair	<u>N.J.A.C. 8:40-4.4</u>	\$250.00
Inoperable heat	<u>N.J.A.C. 8:40-4.6(a)</u>	\$250.00
Inoperable fire extinguisher	<u>N.J.A.C. 8:40-4.4(h)(2)</u>	\$250.00
Unsanitary conditions in the interior of vehicle	<u>N.J.A.C. 8:40-4.5(a)</u>	\$250.00
<u>Vehicle #4 Violations</u>		
Inoperable/empty main oxygen cylinder	<u>N.J.A.C. 8:40-6.6(a)(4)</u> and <u>N.J.A.C. 8:40-7.2(e)(7)</u>	\$1000.00
Missing portable oxygen	<u>N.J.A.C. 8:40-6.6(a)(5)</u> and <u>N.J.A.C. 8:40-7.2(e)(7)</u>	\$1000.00
Inoperable portable suction unit	<u>N.J.A.C. 8:40-6.7(a)(3)</u> and <u>N.J.A.C. 8:40-7.2(e)(7)</u>	\$1000.00
Improperly operating stretcher mechanism	<u>N.J.A.C. 8:40-6.8</u>	\$250.00
Numerous missing items, such as Hare Traction and a vest-type upper spinal immobilization device	<u>N.J.A.C. 8:40-6.5</u>	\$250.00
Violation of vehicle safety due to large container of diesel fuel and an automotive alternator found in side compartment	<u>N.J.A.C. 8:40-4.4</u>	\$250.00
Numerous expired items, such as escape respirators, an obstetrician kit, and sterile water	<u>N.J.A.C. 8:40-6.5(f)</u>	\$250.00
Improper exhaust	<u>N.J.A.C. 8:40-4.8</u>	\$250.00
Missing or inoperable marker light	<u>N.J.A.C. 8:40-6.12(f)</u>	\$250.00
Inoperable heat	<u>N.J.A.C. 8:40-4.6(a)</u>	\$250.00
Improper registration	<u>N.J.A.C. 8:40-4.3(b)</u>	\$250.00
Unsafe or balding tire	<u>N.J.A.C. 8:40-4.7(c)</u>	\$250.00
Missing front license plate	<u>N.J.A.C. 8:40-4.3</u>	\$250.00
Unsanitary conditions, including moldy burn sheets and rotting food	<u>N.J.A.C. 8:40-4.5(a)</u>	\$250.00
<u>TOTAL</u>		\$166,750.00

Proposed Revocation:

In addition to the penalty assessment above, the Department proposes to revoke the Mobility Assistance Vehicle and Basic Life Support service provider licenses held by Ever Ready. As stated previously, the enclosed spreadsheet was created by OEMS investigators after a thorough review of Ever Ready's Logisitcare log sheets, which revealed that Ever Ready operated its BLS vehicles with only one EMT from August 30, 2016 to January 19, 2017, in violation of N.J.A.C. 8:40-6.3.

Pursuant to N.J.A.C. 8:40-6.4, the collective duties of the crewmembers staffing a BLS vehicle include:

3. Providing the patient with prompt, effective and appropriate medical care;...
6. Assuring that the patient is attended to by at least one crewmember at all times;
7. Continually monitoring the patient's condition and equipment;...
10. Supervising the well-being of the patient and ensuring the patient's privacy and comfort.

When a BLS vehicle fails to maintain the minimum two crewmember requirement, the provider is failing to fulfill the above referenced duties as there is no EMT present to monitor the patient's condition and provide prompt, effective and appropriate care. Failing to comply with the minimum crewmember requirement places patients' health, safety and welfare at risk. Ever Ready's complete disregard for N.J.A.C. 8:40-6.3 demonstrates an egregious indifference towards patient safety as each BLS transport with only one crewmember placed every patient at risk.

Additionally, the enclosed spreadsheet demonstrates that Ever Ready failed to create any patient care reports for patient transports between August 30, 2016 to January 19, 2017, in violation of N.J.A.C. 8:40-3.6. Patient care reports contain the following information: patient's name; description of the patient's condition at the scene and in transit; chief complaint; vital signs; and a description of care provided to the patient at the scene and in transit. See N.J.A.C. 8:40-3.6. The provider is required to provide a copy of the patient care report to the receiving health care facility. *Id.* Ever Ready's continued failure to complete patient care reports for over four months deprived each patient and receiving health care facility the benefit of vital health care information regarding the patient's condition. Ever Ready's disregard for rules pertaining to patient care and safety is disconcerting. In addition, the multitude of violations cited above further demonstrates Ever Ready's carelessness and indifference for the public's health, safety, and welfare.

Ever Ready's actions demonstrate a gross disregard for OEMS' regulations and, as a result, presents a risk and threat to the public's health, safety, and welfare; therefore, the Department proposes to revoke the Mobility Assistance Vehicle and Basic Life Support service provider licenses held by Ever Ready Medical Response. Please note that the summary suspension of Ever Ready Medical Response's MAV/BLS licenses shall remain in full force and effect until the revocation becomes final.

Conclusion:

Payment of \$166,750.00 must be submitted within 30 days from the date of this Notice. Payment may be submitted electronically through the E-Pay link on our website (www.state.nj.us/health/ems) or with a certified check or money order made payable to "Treasurer State of New Jersey". In accordance with N.J.S.A. 26:2H-16 and N.J.A.C. 8:40-7.2(h), failure to pay this penalty may result in the delinquent account being recorded as a judgment against you and enforced according to law (N.J.S.A. 2A:58-10). Payment should be forwarded to:

New Jersey Department of Health
Office of Emergency Medical Services
P.O. Box 360
Trenton, NJ 08625-0360
Attn: Mr. Scot Phelps

Pursuant to N.J.S.A. 26:2H-13 and N.J.A.C. 8:40-7.3(b), you may request a hearing before the Office of Administrative Law to contest the proposed revocation and penalties. Your request for a hearing on this matter must be submitted in writing and must be accompanied by a response to the deficiencies noted above. In the event that you request a hearing, the proposed revocation and penalties shall be held in abeyance until such time as the hearing has been concluded and a final decision has been rendered. However, because Ever Ready's MAV/BLS operating license has been summarily suspended, it shall remain in summary suspended status even if a hearing has been requested to contest this Notice of Proposed Revocation and Penalty.

Your request for a hearing must be submitted within 30 days from the date of this Notice. Please include the control number **2017-0022V** on your correspondence and forward your request to:

New Jersey Department of Health
Office of Legal & Regulatory Compliance
P.O. Box 360, Room 805
Trenton, NJ 08625-0360
Attn: Ms. Tamara Roach

Finally, please note that failure to submit a request for a hearing within 30 days from the date of this Notice shall render this Notice final, and the license revocations shall become effective and the penalty amount due and owing without further Notice. If you have any questions concerning this matter, please contact Dr. Jo-Bea Sciarrotta, OEMS Compliance Officer, at (609) 633-7777.

Sincerely,

Scot Phelps, JD, MPH, Paramedic
Director, Emergency Medical Services

Enc: spreadsheet
cc: Eric Hicken, OEMS
Timothy Seplaki, OEMS
James Sweeney, OEMS
Dr. Jo-Bea Sciarrotta, Compliance Officer
Tami Roach, Office of Legal & Regulatory Compliance

SENT VIA REGULAR US MAIL AND
CERTIFIED MAIL # 7012 2210 0000 7414 9943
RETURN RECEIPT REQUESTED