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Public Service Commission
Docketing Department
101 Executive Center Dr., Suite 100
Columbia, SC 29210

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DOCKETING DEPT.

**RE: DOCKET NO. 2007-445-A**

To Whom It May Concern:

I was informed on October 21, 2008 that there was a hearing on proposed "Stretcher Van" regulations with a deadline for comment being October 31, 2008. I found this out at an ORS meeting in North Charleston. This was the same response other providers had at this meeting. I have had several conversations with Logisticare and DHHS over the course of the year and I have not been informed of any hearing. I have grave concerns that the only individuals present, at this hearing, were the Brokers who have a major stake in this financially.

Please take note text: 103-133(7) PC&N (Stretcher Vans) It states, "Stretcher vans are not required or authorized to provide medical monitoring, medical aid, medical care or medical treatment of passengers during their transport." Next page under B. Vehicle Requirements number 9 states, "A stretcher van shall not contain medical equipment or supplies or any marking, symbols or warning devices that imply that it offers medical care or ambulance transportation." Last page number 2 states, "When the medical condition of a passenger suddenly changes and requires care to be rendered, the operator of the stretcher van will immediately contact the local 911 dispatcher to request help". "Appropriate basic first aid shall be initiated and continued until the EMS service has intercepted the transport or arrival at the hospital."

This regulation is contradictory by stating Stretcher Vans are not authorized to provide medical care and are not authorized to carry medical equipment. So how can they initiate "appropriate basic first aid"? This regulation allows Stretcher Vans to continue transporting to the hospital, like an ambulance would.

"Stretcher vans are not required or authorized to provide medical monitoring" Under "Driver and Assistant Driver Qualifications/Requirements" number 4 states, "The driver assistant shall be seated in the passenger compartment while the vehicle is in motion and shall notify the driver of any sudden change in the passenger's condition." This appears to be "medical monitoring".

I refer to and agree with the SCEMSA & SCHCA May 2008 letters. The standard of care will greatly be affected in the State of South Carolina.

Example:

Patient picked up from home and transported to dialysis. Patient says good morning and everything seems fine. Under this new rule, "Stretcher Van" the non-EMT individuals will think everything is fine and transport the patient to dialysis. Seems like no problem.

Same scenario but with an EMT providing patient assessment and care.

Patient picked up from home and transported to dialysis. Patient says good morning and everything seems fine. The EMT performs an assessment and find that the patients blood

pressure is to low, the patient has fluid on their lungs or oxygen saturation is low. The patient requires oxygen and transportation to the ER.

Under the proposed "Stretcher Van" regulation the patient is at dialysis but now needs an Ambulance to transport this patient to the ER, which incurs another bill for Medicaid. Now the patient suffers due to a delay in assessment, treatment and transport.

Is the State willing to allow one life to be jeopardized by lowering the "Standard of Care"?

MTM letter dated January 29, 2008 to SC Public Service Commission states, "The addition of the Stretcher Van staff will create more jobs and a new level in career path." Layoffs and unemployment in the non-emergent EMT field will vastly increase if this proposal is approved and will tax the State even more. MTM seems to agree partially with the layoff theory and they state, "Moreover, MTM supports the Stretcher Van" Regulation as it will free up over 1,000 trips monthly currently being transported via ambulance" This will not allow the ambulances to do more transports but less. The staffing is based on these transports. On average, each ambulance transports 5 patients per 8 hours worked. That would equal 14 EMT's or 7 ambulances per day laid-off just in Regions 1 and 2. How many regions are in the State? There are regulations established for non-emergent stretcher transportation through SC DHEC EMS. Why are the State of SC and the Brokers pursuing a lower standard of care? Please research this.

"There was no scientific or technical basis relied upon in the development of this regulation."???

Evacuations will be hindered due to this proposal. A large portion of ambulances will be replaced with stretcher vans. This will lead ambulance providers to not sign evacuation agreements with nursing homes, hospitals and assisted living. The State requires all facilities to have such agreements with ambulance providers. This will now put the burden on the local Counties and the State EPD.

By lowering the "Standard of Care" this regulation will circumvent EMT's and Paramedics because the Brokers have sole discretion on who transports and what fees are paid for each level of service. These brokers are for-profit companies. Under "Preliminary Fiscal Impact Statement" the regulation states, "There will be no increased cost to the State or its political subdivisions." This regulation fails to mention that if this regulation is not approved it still "will be no increased cost to the State or its political subdivisions." This proposal will not save nor cost the State any money because the State pays a flat rate to these Brokers to provide transport services. All this proposal will do is put more money in the for-profit Brokers pocket unless they are willing to give it back to the taxpayers of South Carolina. This is 21st century and it is not the time to regress to the days of the stone ages. To consider a non-EMT "Stretcher Van" is preposterous and dangerous.

I would like to thank the Public Service Commission for the opportunity to submit comments in reference to the proposed Stretcher Van Regulations.

Respectfully,

Timothy Pitko
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