



Fire Department

William Wentlandt
Chief

Mark A. Sain
Assistant Chief

November 18, 2005

Members of the Public Safety Committee
Common Council, City of Milwaukee
200 East Wells Street
Milwaukee, WI 53202

Dear Members:

The Milwaukee Fire Department (MFD) respectfully submits this minority report of the Basic Life Support Transports Policy Review Task Force.

1. Implement a Unified Dispatch System

Recommendation that all unscheduled emergency medical calls for service are received, triaged, and dispatched by one dispatch center in the City of Milwaukee.

The foundation of a community public safety system includes the immediate access to emergency services through a 911 system. The success of a high performing community emergency medical services (EMS) system is also dependent on the immediate and easily accessible entry into the 911 system.

Currently in Milwaukee, calls for emergency medical service are received at different points of entry. Some are appropriately initiated through the 911 system directly to the City of Milwaukee and the Milwaukee Fire Department. Many, however, are initiated individually when citizens contact private ambulance companies directly by contacting their respective seven-digit phone numbers.

Many private provider transports are not initiated through the 911 system. These emergency medical calls are not subject to review and reporting to the City of Milwaukee Ambulance Service Board and the Public Safety Committee of the Common Council.

The Milwaukee Fire Department supports that a one point of entry 911 system is critical to the safety of Milwaukee's citizens and visitors. Regardless of the type of emergency service request resulting from a fire, natural or man-made disaster, emerging medical event, or act of terrorism, the City is obligated to ensure that all emergency events are managed by its 911 system.

Emergency medical calls that are received through the City of Milwaukee 911 system are triaged by incident type and by an approved medical dispatch protocol and are routed to the appropriate responder, which may be the Milwaukee Fire Department or a private provider. The result is an immediate and consistent application of all calls and the timely response of emergency medical service throughout the City 911 system.

All emergency medical calls for service to the 911 system are also provided with pre-arrival medical instructions whenever possible. Potentially life-saving information and directions for immediate citizen action on what to do before the emergency responders arrive is provided.

In contrast, requests for emergency medical service that are not received by the 911 system may experience prolonged response times from providers who advertise their services in other than their assigned response areas. The caller does not receive pre-arrival instructions and the ambulance rates not regulated. The information on these responses is not available to the system for review and oversight.

The American Ambulance Association (AAA) advocates a single point of entry for all requests for ambulance service. The AAA cites studies that indicate slightly more than 50 percent of all medical requests enter the system via 911 access, and that slightly less than 50 percent of all medical requests enter the system through seven-digit business phone numbers. By this calculation, nearly 50 percent of all calls for emergency medical service are not accounted for in, or regulated by, the system.

Private providers are required by the current Emergency Medical Services System Handbook of Operations to insert an advertising disclaimer regarding use of their seven-digit number to access services which states "For Life-Threatening Emergencies, call 911." This does not enhance service, but only adds to consumers' confusion.

Individuals experiencing a medical emergency should be able to access the needed assistance through one phone number, 911. They should only be charged the ambulance rates approved by the Common Council, and have the benefit of the oversight and review provided by the City system. Persons in need of emergency medical care should not be faced with deciding if their event is life threatening or

not, experiencing prolonged response times, or being charged at a higher rate than approved by the City of Milwaukee.

Current guidelines require that the private providers do not "initiate, engage in, or participate with any efforts, whatever their nature, which are designed with the intent to disrupt or interfere with the orderly and regulated operation of the City of Milwaukee Emergency Medical Services System." The ongoing practice of allowing receipt of unscheduled calls via a seven-digit private number clearly disrupts and interferes with the operation of the City EMS system.

A unified dispatch system with 911 as the only phone number through which to request unscheduled medical response will provide the City of Milwaukee's citizens and visitors the highest quality and efficient emergency medical service they deserve and expect.

Other Information:

- Chapter 75-15 of the City of Milwaukee Code of Ordinances, Miscellaneous Health Provisions:

"Central dispatch" is defined as a process that includes the reception and processing of all calls for emergency medical assistance at a single communications center. The fire department is the single communications center.

- Excerpted from Contracting for Emergency Ambulance Services Guide (AAA):

Continuous Pursuit of Clinical Excellence

High-quality companies stress the proper use of 911 to call for help.

Leaving the choice to the customer. Emergency patients make poor shoppers. A system that forces patients to select an emergency provider through retail competition is flawed. Consumers must be able to make choices based on quality and price before good selections can be made. This function is properly handled by local government through competition for the market. The advent of enhanced 911 has eliminated this design flaw in many areas, yet system designers must work to eliminate shopping for emergency services in all situations where it still exists.

The 911 Act directs the FCC to make 911 the universal emergency number in the United States for all telephone services, both wireline and wireless. See State of Wisconsin attachment for further information.

2. 911 Participation Fee

Recommendation that the City of Milwaukee recover costs directly incurred when processing incidents through the 911 system, which are assigned to private providers.

At the September 14, 2005, Basic Life Support Transports Policy Review Task Force meeting, the concept of charging a fee to the private ambulance service providers for costs incurred by the City to provide 911 service was discussed. During the review and recommendations phase of the committee, no comment was made on the implementation of a 911-participation fee.

The fire department receives approximately 90,000 calls per year for service through the 911 system. The equipment and personnel to receive and process these calls costs the City and the Milwaukee Fire Department over two million dollars annually. In 2004, approximately 46,000 calls for service were dispatched to private ambulance service providers for response and transport. This service, provided free of charge to the private providers, costs the City approximately one million dollars in 2004.

A report from the City of Milwaukee Comptroller dated August 5, 2005, commented on the feasibility of implementing a dispatch fee for 911 calls. The report was unable to identify the cost incurred by private providers for responding to 911 calls. The report disclosed that a dispatch fee would directly affect the company's bottom line.

The City is in a position to recover costs incurred through the implementation of a dispatch fee. A fee to recover the cost of handling the calls for the private agencies should be considered.

Sincerely,



WILLIAM WENTLANDT
Chief

SUMMARY OF KEY COMPONENTS FROM WI STATUTES, STATE EMS COMMUNICATION PLAN AND MILWAUKEE LOCAL ORDINANCE

Prepared by the State of Wisconsin Department of Health and Family Services,
Bureau of Local Health Support and Emergency Medical Services

WI STATUTES

- ❑ **WI Stats. 146.70 (2) Emergency phone system.**
146.70(2)(a) Every public agency may establish and maintain within its respective jurisdiction a basic or sophisticated system under this section. Such a system shall be in a central location.
- ❑ **146.70(2)(c) The digits "911" shall be the primary emergency telephone number within every basic or sophisticated system established under this section. A public agency or public safety agency located within the boundaries of a basic or sophisticated system established under this section shall maintain a separate 7-digit phone number for nonemergency telephone calls. Every such agency may maintain separate secondary 7-digit back-up numbers.**

WI EMS COMMUNICATION PLAN

- ❑ **1.1 Public Access to EMS**
An essential component of an EMS communication system is public access to the three-digit public safety phone number 911. This is achieved through the use of 911 public safety answering points (PSAPs) which route all emergency calls to the appropriate agency.
- ❑ **2.1 Public Access to EMS**
The 911 system is the recommended means of accessing the EMS system. Service areas that have 911 coverage should only allow the use of other means of access as back-ups in case of 911 failure. Service areas should not allow seven-digit telephone number advertising for emergency ambulance service access where 9-1-1 is available.

MILWAUKEE LOCAL ORDINANCE

The Ambulance Service Board finds that the City of Milwaukee has a substantial interest in regulating the advertising of ambulance companies to prevent public confusion regarding the proper phone number to call in

the event of a life-threatening emergency. To avoid confusion, providers may not:

- Engage in advertising, communication, marketing, publicity, distributing of informational literature, or other such efforts which misinform or misrepresent the nature of their ambulance service or its capacity or capability within the City of Milwaukee.**
- Knowingly advertise, communicate, market, or publicize their ambulance service for the care and handling of life-threatening emergencies in the city of Milwaukee.**
- When the private provider's telephone number is listed on any advertising material, the material shall also include the following statement prominently displayed: "For Life-Threatening Emergencies, call 911" (paraphrased).**

[The following pages contain more detail and were used as the basis for the summary page above. Items highlighted in bold are in the summary document.]

WI STATE STATUTES ON 911

WI Stats. 146.70 (2) Emergency phone system.

146.70(2)(a) Every public agency may establish and maintain within its respective jurisdiction a basic or sophisticated system under this section. Such a system shall be in a central location.

146.70(2)(b) Every basic or sophisticated system established under this section shall be capable of transmitting requests for law enforcement, fire fighting and emergency medical and ambulance services to the public safety agencies providing such services. Such system may provide for transmittal of requests for poison control to the appropriate regional poison control center under s. 146.57, suicide prevention and civil defense services and may be capable of transmitting requests to ambulance services provided by private corporations. If any agency of the state which provides law enforcement, fire fighting, emergency medical or ambulance services is located within the boundaries of a basic or sophisticated system established under this section, such system shall be capable of transmitting requests for the services of such agency to the agency.

146.70(2)(c) The digits "911" shall be the primary emergency telephone

number within every basic or sophisticated system established under this section. A public agency or public safety agency located within the boundaries of a basic or sophisticated system established under this section shall maintain a separate 7-digit phone number for nonemergency telephone calls. Every such agency may maintain separate secondary 7-digit back-up numbers.

146.70(2)(d) Public agencies, including agencies with different territorial boundaries, may combine to establish a basic or sophisticated system established under this section.

146.70(2)(e) If a public agency or group of public agencies combined to establish an emergency phone system under par. (d) has a population of 250,000 or more, such agency or group of agencies shall establish a sophisticated system.

146.70(2)(f) Every basic or sophisticated system established under this section shall utilize the direct dispatch method, the relay method or the transfer method.

WI EMS COMMUNICATION PLAN

1.1 Public Access to EMS

An essential component of an EMS communication system is public access to the three-digit public safety phone number 911. This is achieved through the use of 911 public safety answering points (PSAPs) which route all emergency calls to the appropriate agency. Enhanced 911 (E911) has additional features beyond the basic 911 system that include:

- Selective routing of the call to the appropriate center based on originating location.
- Automatic number identification (ANI) and automatic location identification (ALI) of the caller

Cellular telephone access to 911 is still problematic because enhanced 911 features are not functional without additional infrastructure. The location of the caller and routing of the message to the appropriate EMS service are still dependent on verbal information from the caller, which may lead to delayed response times.

2.1 Public Access to EMS

Current 911 coverage in Wisconsin covers 99.99% of the State. Statewide E911 or Enhanced 911 coverage is 98.76% of Wisconsin. Work needs to continue to

make E911 statewide & include the ability to locate wireless calls to their actual physical location. A map illustrating Wisconsin's 911 coverage can be found in Appendix E. **The 911 system is the recommended means of accessing the EMS system. Service areas that have 911 coverage should only allow the use of other means of access as back-ups in case of 911 failure. Service areas should not allow seven-digit telephone number advertising for emergency ambulance service access where 9-1-1 is available.**

PUBLIC INFORMATION AND EDUCATION CITY of MILWAUKEE

The Emergency Medical Services System within the City of Milwaukee is a complete system with each of its component parts easily accessible for use by the general public. The component parts are the Milwaukee Fire Department and the private provider sector. To insure the health, safety and welfare of its citizens, initial entry into the system is controlled by the Milwaukee Fire Department.

The Ambulance Service Board finds that the City of Milwaukee has a substantial interest in regulating the advertising of ambulance companies to prevent public confusion regarding the proper phone number to call in the event of a life-threatening emergency. Accordingly, the Board has determined that the following guidelines are essential toward the end of insuring the health, safety and welfare of the citizens of Milwaukee and protecting the substantial interest of the City of Milwaukee.

City of Milwaukee private providers shall not:

- **Engage in advertising, communication, marketing, publicity, distributing of informational literature, or other such efforts which misinform or misrepresent the nature of their ambulance service or its capacity or capability within the City of Milwaukee.**
- **Knowingly advertise, communicate, market, or publicize their ambulance service for the care and handling of life-threatening emergencies in the city of Milwaukee.**
- Initiate, engage in, or participate with any efforts, whatever their nature, which are designed with the intent to disrupt or interfere with the orderly and regulated operation of the City of Milwaukee Emergency Medical Services System.

City of Milwaukee private providers shall comply with the following:

- Submit all forms of proposed advertising and marketing of their services directed to the general public to the Commissioner of Health and the Chief of the Fire Department for review prior to its being disseminated in any form to the general public. The City officials shall complete their review of the submitted material within ten (10) business days of its receipt. The review is for the purpose of ensuring that the communication is not misleading or untruthful; regards a lawful activity; and has no adverse impact upon the substantial interests of the City of Milwaukee. It is also undertaken to prevent public confusion regarding the proper telephone number to call in the event of a life-threatening emergency.

If the City officials make an adverse finding, they shall immediately so advise the private provider which submitted the material, and the City officials or their designee shall work with that provider to develop an unobjectionable alternative. No material submitted to City officials for review shall be disseminated to the general public in any fashion without the prior written approval of the designated City officials.

In the event private providers elect to distribute telephone stickers to the general public they agree to use a standard format telephone sticker listing the appropriate telephone numbers for the Fire Department / Paramedics / Ambulance (911), for the Police Department (911) and the private provider's telephone number. When the private provider's telephone number is listed, the telephone sticker shall include the following statement prominently displayed:

"For Life-Threatening Emergencies, call 911"

The letters and telephone numbers identifying the Fire Department / Paramedics / Ambulance (911), Police Department (911) and private provider shall be of the same dimension and color.

Additionally, all forms of marketing, including--without limitation by enumeration--written documents, newspaper and magazine advertising, note pads, electronic media (such as an internet web site) and television and radio advertising, shall include the words: "For Life-Threatening Emergencies, Call 911" in the text of the ad. These words must be visible by looking at the information straight-on. In radio advertising, they shall be audible. In television advertising, they shall be both audible and visible. Pencils, pens and pins, which are extremely small

marketing items and do not reasonably allow room for these words, are exempt from this requirement.

Additional exceptions from this requirement may be made by the Commissioner of Health and the Chief of the Fire Department on a case by case basis during their prior review of all advertising. In situations which there is disagreement between the two reviewers, the matter will be brought to the Ambulance Service Board.

WW/jb

Letters&Memos\Alderspersons\PS MFD Min Rep Attach 1105