



# STATE HEALTH PLANNING AND DEVELOPMENT AGENCY

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May 20, 2015

## CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Joseph Hunt  
President  
Hawaii Life Flight Corporation  
150 Lagoon Drive  
Honolulu, HI 96819

Dear Mr. Hunt:

The State Health Planning and Development Agency (the "Agency") has evaluated Certificate of Need application #15-04A from Hawaii Life Flight Corporation (the "applicant"), for the establishment of surface ambulance services at 150 Lagoon Drive, Honolulu, Hawaii, at a capital cost of \$373,000 (the "Proposal").

1. Pursuant to Title 11, Chapter 186 of the Hawaii Administrative Rules (HAR), the Agency has determined that this proposal is eligible for administrative review as it meets the criterion in Subsection 11-186-99.1(b) (2), i.e.: "Service changes which will have a capital expense of \$1,000,000 or less, and which will have an increased annual operating expense of less than \$500,000".
2. The Proposal was reviewed in accordance with Section 11-186-15, HAR.
3. The applicant states that "Additional supplemental/complimentary ground critical care ambulance transport units would provide internal completion and facilitate continuity of care for existing state licensed air medical ambulance services provided by Hawaii Life Flight, and allow Hawaii Life Flight transport teams to provide the entire spectrum of care to their patients-specifically transporting patients from aircraft landing at Honolulu International Airport to Oahu receiving medical facilities via Hawaii Life Flight ambulance."
4. The applicant states that "The proposed services will also strive for equitable access to health care services statewide by improving access/transport at reduced cost to the patient via the proposed HLF surface ambulance services on Oahu by providing an option to HLF patients that does not add cost for the air ambulance transport ground component of transfer that currently exists without any other options to patients at this time."

5. In written testimony dated May 7, 2015, Anna Paro, Administrative Manager, International Life Support, Inc., d/b/a American Medical Response ("AMR") states "All patients are currently being transported by existing services. The Application only serves to duplicate services already provided while threatening to negatively impact the current EMS."
6. In her written testimony, Ms. Paro states that "The proposed HLF services will duplicate and harm the current capacity for emergency and non-emergency transport. Duplicating the service provided by AMR and C&C is not economical, and is not efficient. Rather than reducing or eliminating redundant health care services, as the State Plan is required to do by statute, the proposal creates a redundancy where none currently exists."
7. In her written testimony, Ms. Paro further states that "If Applicant is only to transport HLF patients, this will lead to a reduction of unit hours of AMR ambulances, which are currently available to provide interfacility transfers, 9-1-1 back up responses, and provide stand-by coverage to assist in disaster mitigation. All such reductions in ambulance availability will impede ambulance availability and actually delay transport times from rural Oahu."
8. The applicant states that "3-4 Additional EMT-Basic staff may be hired to supplement the crew structure and be scheduled on 12 hour shifts as surface ambulance operators/drivers as needed based on surface ambulance utilization assessment once it has been in full operations."
9. In her written testimony dated May 7, 2015, Ms. Paro states that "The current shortage of trained personnel has been well documented by SHPDA, Kapi'olani Community College, the state EMS Advisory Committee, and by the media. This shortage has left C&C chronically short of trained emergency personnel, both EMTs and MICTs. At EMS Advisory Committee meetings, Oahu and Hawaii Counties repeatedly report shortages of trained EMTs and MICTs and about the struggle to maintain staffing at current levels."
10. In her written testimony, Ms. Paro further states that "Applicant's proposal requires hiring up to four new EMTs at a time when the state already has a severe shortage of EMTs and MICTs... Thus, any EMT or MICT Applicant hires will likely come from existing providers of emergency 9-1-1 ambulance services, thus endangering the viability of those services..."


Conclusions and Order

Having taken into consideration the records pertaining to application #15-04A on file with the Agency, all of the oral and written testimony, exhibits and related filings submitted by the applicant and other affected persons, the Agency finds that the applicant has not proven by a preponderance of the evidence that its Proposal meets the criterion in HAR 11-186-15(a)(10), i.e., "The relationship of the proposal to the existing health care system of the area." The Agency finds that the Proposal is likely to have a negative impact on the existing health care system of the area.

Accordingly, the State Health Planning and Development Agency hereby **DISAPPROVES** and **DENIES** a Certificate of Need to Hawaii Life Flight Corporation for the Proposal described in Certificate of Need application #15-04A.

As the Proposal fails to meet the criterion in HAR 11-186-15(a)(10), it is not necessary for the Agency to make any findings as to the application's relationship to the remaining criteria in HAR 11-186-15(a).

Please be advised that pursuant to Section 323D-47, HRS any person may, for good cause shown, request in writing a public hearing for reconsideration of the Agency's decision within ten working days from the date of this decision. Accordingly, if no person makes such a timely request for reconsideration, this decision shall become final immediately after the deadline for making such a request has expired.

  
Romala Sue Radcliffe  
Administrator