



HAWAII STATE HEALTH PLANNING AND DEVELOPMENT AGENCY

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ADMINISTRATIVE APPLICATION - CERTIFICATE OF NEED PROGRAM

Application Number: # 21-19E
To be assigned by Agency

Date of Receipt:
STATE HEALTH PLANNING & DEV. AGENCY

APPLICANT PROFILE

Project Title: Expansion of Ground Ambulance Service

Project Address: Honolulu: 155 Kapalulu Place Suite 103, Honolulu, HI 96819 / Maui: 150 Paahana Street, Kahului, HI 96732
Kona: 73-200 Kupipi Street Kalaoa, HI 96740 / Hilo: 79 Punahale Street Hilo, HI 96720

Applicant Facility/Organization: AirMD, LLC

Name of CEO or equivalent: JaeLynn Williams

Title: CEO

Address: 5500 South Quebec Street Greenwood Village, CO 80111-1914

Phone Number: (303) 792-7400 Fax Number:

Contact Person for this Application: Jillian Kelekoma

Title: Account Executive

Address: 155 Kapalulu Place Suite 103 Honolulu, HI 96819

Phone Number: (808) 320-0175 Fax Number:

CERTIFICATION BY APPLICANT

I hereby attest that I reviewed the application and have knowledge of the content and the information contained herein. I declare that the project described and each statement amount and supporting documentation included is true and correct to the best of my knowledge and belief.

Signature [Handwritten Signature]

Date 9.15.21

Jillian Kelekoma
Name (please type or print)

Account Executive
Title (please type or print)

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1. TYPE OF ORGANIZATION: (Please check all applicable)

- Public _____
- Private x
- Non-profit _____
- For-profit x
- Individual _____
- Corporation _____
- Partnership _____
- Limited Liability Corporation (LLC) x
- Limited Liability Partnership (LLP) _____
- Other: _____

2. PROJECT LOCATION INFORMATION

A. Primary Service Area(s) of Project: (please check all applicable)

- Statewide: _____
- O`ahu-wide: x
 - Honolulu: _____
 - Windward O`ahu: _____
 - West O`ahu: _____
 - Maui County: x
 - Kaua`i County: _____
 - Hawai`i County: x

3. DOCUMENTATION (Please attach the following to your application form):

See Attachment 3

- A. Site Control documentation (e.g. lease/purchase agreement, DROA agreement, letter of intent) See Attachment 3A-1 through 3A-7
- B. A listing of all other permits or approvals from other government bodies (federal, state, county) that will be required before this proposal can be implemented (such as building permit, land use permit, etc.) See Attachment 3B1
- C. Your governing body: list by names, titles and address/phone numbers See Attachment 3
- D. If you have filed a Certificate of Need Application this current calendar year, you may skip the four items listed below. All others, please provide the following:
 - Articles of Incorporation See Attachment 3D-1 through 3D-3
 - By-Laws
 - Partnership Agreements See Attachment 3
 - Tax Key Number (project's location) See Attachment 3

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4. **TYPE OF PROJECT.** This section helps our reviewers understand what type of project you are proposing. Please place an "x" in the appropriate box.

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	Used Medical Equipment (over \$400,000)	New/Upgraded Medical Equip. (over \$1 million) & DE V	Other Capital Project (over \$4 million)	Change in Service	Change in Beds
Inpatient Facility					
Outpatient Facility				X	
Private Practice					

5. **BED CHANGES.** Please complete this chart only if your project deals with a change in your bed count and/or licensed types. Again, this chart is intended to help our reviewers understand at a glance what your project would like to accomplish. Under the heading "Type of Bed," please use only the categories listed in the certificate of need rules.

Type of Bed	Current Bed Total	Proposed Beds for your Project	Total Combined Beds if your Project is Approved
N/A			
TOTAL			

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6. PROJECT COSTS AND SOURCES OF FUNDS

A. List All Project Costs:	21 SEP 15 P3:18	AMOUNT:
1. Land Acquisition		_____
2. Construction Contract	ST. HELENA & DEV. AGENCY	_____
3. Fixed Equipment		<u>\$50,000</u>
4. Movable Equipment		_____
5. Financing Costs		_____
6. Fair Market Value of assets acquired by lease, rent, donation, etc.		_____
7. Other: _____		_____
TOTAL PROJECT COST:		<u>\$50,000</u>

B. Source of Funds

1. Cash		<u>\$50,000</u>
2. State Appropriations		_____
3. Other Grants		_____
4. Fund Drive		_____
5. Debt		_____
6. Other: _____		_____
TOTAL SOURCE OF FUNDS:		<u>\$50,000</u>

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7. **CHANGE OF SERVICE:** If you are proposing a change in service, then please briefly list what services will be added/modified. Be sure to include the establishment of a new service or the addition of a new location of an existing service. Please reference the Certificate of Need Rules Section 11-186-5 for the categories of services. If you are unable to determine which category best describes your project, please consult with agency staff.

Facility to facility transports

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8. **IMPLEMENTATION SCHEDULE:** Please present a projected time schedule for the completion of this project from start to finish. Include all of the following items that are applicable to your project:

- a) Date of site control for the proposed project,
- b) Dates by which other government approvals/permits will be applied for and received,
- c) Dates by which financing is assured for the project,
- d) Date construction will commence,
- e) Length of construction period,
- f) Date of completion of the project,
- g) Date of commencement of operation

Please remember that the Agency does monitor the implementation of Certificates approved. Non-implementation of a project as described in your application may result in a fine and/or withdrawal of the certificate of need.

9. **EXECUTIVE SUMMARY:** Please present a brief summary of your project. In addition, provide a description of how your project meets each of the certificate of need criteria listed below. If a new location is proposed, please attach an easy to read map that shows your project site.

See Attachment 9

- a) Relationship to the State of Hawai'i Health Services and Facilities Plan.
- b) Need and Accessibility
- c) Quality of Service/Care
- d) Cost and Finances (include revenue/cost projections for the first and third year of operation) See Attachment 9D-1
- e) Relationship to the existing health care system
- f) Availability of Resources.

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10. **Eligibility to file for Administrative Review.** This project is eligible to file for Administrative review because: (Check all applicable)

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_____ It involves bed 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.

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_____ It involves 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.

_____ It is an acquisition of a health care facility or service, which will result in lower annual operating expenses for that facility, or service.

_____ It is a change of ownership, where the change is from one entity to another substantially related entity.

_____ It is an additional location of an existing service or facility.

_____ The applicant believes it will not have a significant impact on the health care system.

An Emergency Situation exists per HAR Sec. 11-186-99 due to the impact of the demand for facility to facility transports required as a result of the COVID-19 pandemic. The state does not have enough ground providers to handle the current demand stemming from the COVID-19 pandemic creating an substantial injury to public health and/or clear and present danger of such an injury occurring.

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Attachment 8: Implementation Schedule

8. Implementation Schedule

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- a) Dates of site control for the proposed project:
 - a. Oahu: 6/17/2021
 - b. Maui: 8/21/2020
 - c. Hilo: 4/7/2018
 - d. Kona: 4/1/2021
- b) Dates by which other government approvals/permits will be applied for and received: Once the CON is approved, we will contact the State of Hawaii Emergency Medical Services Bureau for updated licensure to reflect the Certificate of Need.
- c) Dates by which financing is assured for the project: N/A Funds are secured.
- d) Date construction will comment: N/A None needed.
- e) Length of construction period: N/A
- f) Date of completion of the project: Upon approval of Expanded Ground Ambulance Service License.
- g) Date of commencement of operation: Upon approval of Expanded Ground Ambulance Service License.



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Attachment 9: Executive Summary

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9. Executive Summary

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Introduction:

AirMD, LLC dba LifeSave is a program owned and operated by Air Methods Corporation, headquartered in Denver, Colorado. Air Methods operates over 300 bases providing critical patient care by air and ground ambulance, servicing 49 states. Air Methods Corporation acquired AirMD, LLC at the end of 2020 adding to their fleet of fixed wing and ground ambulances. The LifeSave program in Hawaii has been compliant and in operation since 2013 and is wholly owned by Air Methods where we provide the entire aviation/clinical crews and support, as well as aircraft, fuel, maintenance, dispatch, and billing. LifeSave clinician requirements and education are unmatched in the industry, regularly participate in quality and risk management systems as well as patient safety action programs with direct physician involvement.

AirMD, LLC is applying for an Emergency Certificate of Need in the State of Hawaii to facilitate a rapid response to the State and patients during a time of need and public health crisis. The Delta variant of COVID-19 has created a state of emergency within our healthcare system statewide. Our hospitals regularly operate at, or near capacity with no bed availability due to case surges and hospital lengths of stay. The EMS system within the state of Hawaii has also seen a dramatic increase in the demand for 911 response as well as interfacility (non-911) transports. These increases have a devastating effect on public health as resources are not capable of meeting the ever-increasing demand and healthcare provider burnout.

LifeSave is already well established in the existing health care system with long term relationships and contracts in place, providing options in essential air medical transport. Ground ambulances were added to our transport system in 2020 as a continuation of air transport to the facility and/or airport. The added capability to assist during a time of need for interfacility ground transports will aid in providing patient care and transportation to the right facility at the right time.

Air ambulance transport is the primary role and function of LifeSave, the currently licensed ground ambulances serve as a continuation of air transport. The current state of emergency has created an environment where patients on all islands, especially the neighboring islands, are experiencing decreased access to care due to hospital capacity and surge. This added resource will serve to alleviate the current system at peak times, which in turn will assist the system in the transport of patients to the appropriate level of care, regardless of the island they reside. As an Air Ambulance provider there's a decrease in the number of patients transports, a lot of which is due to no bed space in receiving hospitals. LifeSave has highly trained critical care providers who can assist during a time of need to the community they serve. The added service will not stray from our current service as an Air Ambulance provider, we currently have 3 aircraft bases serving the state of Hawaii, and 4 currently licensed ground ambulance units located in Hilo, Kona, Maui, and on Oahu.

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All patient transport missions in Hawaii are coordinated and followed by AirCom, owned and operated by AirMethods. The added ground transports and call intake would be executed by this large, centralized communication center. AirCom will utilize appropriate triage and logistical coordination to assure patient transport requests, regardless of air or ground, are handled accordingly based on resource availability and in-house medical control.

A. Relationship to the State of Hawai'i Health Services and Facilities Plan

AirMD, LLC is licensed by the Hawaii Board of Emergency Medical Services and is a compliant and contributing member. AirMD, LLC dba LifeSave is emergently requesting permission to provide ground ambulance transport between facilities to assist during this healthcare crisis. AirMD, LLC submits this application in the best interest of patients based on requests from our healthcare and EMS partners and the obvious need during this state of emergency.

AirMD, LLC proposes to utilize the critical care air ambulance clinical crew and ground ambulance and staff when available, not to detract from our primary role as an Air Ambulance provider. The infrastructure, staffing, and resources are in place and can be operable once the emergency CON is approved and licensure granted. This emergency Certificate of Need proposal affects the Hawaii Health Services and Facilities Plan ("the Plan") and general principles by:

SHCC General Principals (reference Page 33 of the State of Hawaii Health Services and Facilities Plan)

SHCC General Principle #1. Promote and support the long-term viability of the health care delivery system:

Promoting and supporting the long-term viability of the health care delivery system, functioning as an additional asset for ground transport when there is a need to protect public health and patient safety. The new proposed service will help improve access for potential patients as it preserves availability of 911 service vehicles for immediate response that may have been tasked with the movement of overflow inter-facility transports. The addition of the ground ambulances could eliminate 100% dependence on the only privately owned and operated ambulance service in the State of Hawaii and will allow the other services to be utilized on patients within their region.

SHCC General Principle #2. Expand and retain the health care workforce to enable access to the appropriate level of care in a timely manner:

Expanding our current healthcare workforce and capabilities to enable access to the appropriate level of care in a timely manner during an urgent time of need. The addition will allow for facilities to triage based on patient acuity and availability of a critical care crew for those patients, without impacting the facility staffing. Jobs will be created in the

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healthcare workforce as EMTs, Paramedics and Nurses will be hired to drive the ground ambulances and work as critical care air ambulance providers. 21 SEP 28 P 3 26

SHCC General Principle #3. Ensure that any proposed service will at least maintain overall access to quality health care at a reasonable cost:

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The proposed addition of the ground ambulances will work in concert with our air transport system and will ensure that LifeSave will maintain overall access to our high-quality services at a reasonable cost to any potential patient who may require our transport services. The addition of the LifeSave ground ambulances for inter-facility transfers, will reduce the financial impact and fatigue 911 providers are experiencing, especially on Oahu. LifeSave critical care crew will safely provide the entire bedside-to-bedside patient transport process, and in-turn provide the patient with a fair and reasonable invoice while retaining consistency of care with the same medical transport team. Patients will have increased access to 911 services through current ground units not being tasked for interfacility transports. Invoicing will be streamlined, coming from one company, as billing is not outsourced, and patient advocacy is a pillar in Air Method's approach to ensuring that patient out-of-pocket costs are low and manageable.

SHCC General Principle #4. Strive for equitable access to health care services (i.e., remove financial barriers, increase availability of physicians):

Strive for equitable access to health care services through community partnerships and removing unnecessary barriers like memberships. Financial impacts and barriers are managed through patient advocacy to ease the process of billing and decrease the financial burden on patients and families.

SHCC General Principle #5. Ensure all projects are appropriate for the regional and statewide continuum of care:

AirMD, LLC ensures all projects are appropriate for the regional and statewide continuum of care through our continued compliance and contribution to various healthcare boards, committees, and work groups. Allowing LifeSave to expand care for the entire transport spectrum strengthens the regional and statewide Health Services and Facilities Plan.

SHCC General Principle #6. Encourage and support health education, promotion, and prevention initiatives:

Air Methods participates in and provides education for providers on a national, regional, and statewide level, as well as actively participating on all state EMS and trauma initiatives regarding air and ground.

SHCC General Principle #7. Expand awareness of available human, financial, programmatic resources:

The framework of Air Methods is built upon attributes which directly reflect the values which matter most to us as an organization and how we perform as professionals and

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providers. We are champions of safety ensuring the highest standard of safety and quality. Collaborate to build productive, working relationships with clients and respect. Develop expanded awareness, continuously learn and progress efficiently as a provider to consistently deliver results to our community and healthcare system. Holding ourselves accountable to those results we look to inspire and be part of the healthcare system that expands awareness of available human, financial, and programmatic resources.

The addition of ground ambulances to our current operations as it relates to the State of Hawai'i Health Services and Facilities Plan will complement and improve the process in the air transports we currently provide, will provide consistent care for our patients, provide quality healthcare at a reasonable cost, increase accessibility to 911 services, and aid in providing long-term sustainability for our operations in Hawaii.

SHCC Specific Health Areas of Concern (reference Page 33 of the State of Hawaii Health Services and Facilities Plan):

LifeSave's proposal to establish interfacility ground ambulance services during a state of emergency will support the following Specific Areas of Concern listed in Chapter 3 of the Plan:

SHCC, Specific Areas of Concern #1. Ensure capacity and access to a continuum of long-term care services.

LifeSave's proposed additional ground ambulance services will support increased capacity and access to a continuum of long-term care services for our patients on a state-wide level. The additional ground service and will assure consistent time-sensitive service for these patients statewide.

SHCC, Specific Areas of Concern #2. Establish a statewide emergency and trauma system.

The added ground ambulance services will support and strengthen the statewide emergency trauma system by assisting with time critical, consistent, efficient, and economical transport services by providing additional resources to complement the current system in place. The addition of the proposed ground ambulances will relieve the current stress on the statewide system, increase availability of units, dramatically decrease the current wait times for ground ambulances, thereby improving the patient experience and positively impacting the patient's outcome.

SHCC, Specific Areas of Concern #3. Ensure capacity and access to primary care services.

The added service during this state of emergency will support facility capacity and access to primary care service by assisting with patient transport to proper level of care.

SHCC, Specific Areas of Concern #4. Increase and improve access to mental health programs, services, and education.

The proposed ground ambulance services will increase and improve timely and consistent access to mental health programs and services. The additional resource

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allows for allocation of proper transport resources based on patient need on the island of Oahu as well as patients transported from the outer islands for those services not available. The increased availability of ground ambulance units will result in an overall time savings for each patient transported.

SHCC, Specific Areas of Concern #5. Increase and improve access to substance abuse programs, services, and education.

LifeSave has been and will continue to commit to providing time, energy and resources to all citizens and visitors in the State of Hawaii to increase and improve access for patients suffering from substance abuse through our services and educational offerings.

Subarea Health Planning Council (SAC) Priorities (reference Page 33 of the State of Hawaii Health Services and Facilities Plan):

LifeSave's proposal to provide emergent interfacility ground transport addresses the following Subarea Health Planning Council (SAC) Priorities outlined in Chapter 3 of the Plan, specific to Hawaii County/Hawaii (HSAC), Maui County/Tri-Isle, Honolulu County – the Honolulu (HONSAC) Priorities, the West Oahu SAC Priorities, and the Windward SAC Priorities:

Hawaii County/Hawaii (HSAC) Subarea Priorities (Chapter 3, page 33):

- 1. Provider (Workforce) Shortage:** LifeSave has hired and plans to continue to hire and train new employees to staff the ground ambulances, which will add to the current workforce as specialty care providers.
- 2. Facilities Shortage:** LifeSave currently provides air transport for a multitude of patients from Hawaii County/Hawaii needing transport to a higher level of care. These patients also need ground transport from the referring facilities in Hawaii County to other facilities with proper level of care. The proposed added service will assist with increased facility capacity and access to appropriate level of care. The increased bed space and capacity on Oahu will benefit the entire state of Hawaii.

Honolulu (HONSAC) Subarea Priorities (Chapter 3, page 35):

- 1.** The proposed ground ambulance services will further help increase the availability of ground ambulance units, which will decrease wait time for our patients, thereby increasing our supportive services for the patient. The City and County of Honolulu EMS have faced increased interfacility transports and call volumes directly related to the current state of emergency. The added service will allow us to continue to transport our air ambulance patients as well as assist with on-island transports in a resource depleted, high ground transport volume system.
- 4.** LifeSave's rate structure for our ground ambulance transports will be based on fair market value and supported by our Patient advocacy team, fighting for ethical billing practices.

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West Oahu SAC Subarea Priorities (Chapter 3, page 35):

1. Improve and Increase Access: LifeSave's proposal to add ground ambulance capabilities strives to improve and increase access through emergency services (acute, critical, specialty and emergency care) via our critical care ambulance transport services. The proposed services would add resources in terms of ground ambulance support to ensure availability at a time of resource depletion, exhaustion, and maintained high request volumes.

Windward SAC Subarea Priorities (Chapter 3, page 36):

1. Improve Bed Availability: AS in Honolulu and West Oahu, the proposed services would add resources in terms of ground ambulance support to ensure availability at a time of resource depletion, exhaustion, and maintained high request volumes. This will reduce the waiting time for Windward facility transfers.

Maui County/Tri Isle SAC Priorities (Chapter 3, page 36)

3. Primary, Acute, and Emergency Services:

Recruit and educate an optimal supply of health care workers to meet demand.

LifeSave has hired and plans to continue to hire and train new employees to staff the ground ambulances, which will add to the current workforce as specialty care providers.

Provide Community-based emergency and health care services to underserved communities such as: establishing an aero-medical network of services that responds to all areas.

LifeSave currently provides air transport for a multitude of patients from Maui County-Tri Isle, needing transport to a higher level of care. The proposed added service will assist with increased facility capacity and access to appropriate level of care. The increased bed space and capacity on Oahu will benefit the entire state of Hawaii.

Optimize Reimbursement through Medicare, Medicaid and third-party insurers.

LifeSave is dedicated to the optimization of reimbursement for our patients through our in-house patient advocacy billing division, by saving our patients money and controlling their escalating health care costs.

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B. Need and Accessibility

The Delta variant of COVID-19 has created a state of emergency within our healthcare system statewide. Our hospitals regularly operate at, or near capacity with no bed availability due to case surges and hospital lengths of stay. The EMS system within the state of Hawaii has also seen a dramatic increase in the demand for 911 response as well as interfacility (non-911) transports. These increases have a devastating effect on public health as resources are not capable of meeting the ever-increasing demand and healthcare provider burnout. LifeSave has critical care nurses, paramedics, and EMTs on staff ready to respond in licensed ambulances once the emergency CON is approved, and licensure updated to reflect.

LifeSave participates in quarterly regional and statewide healthcare boards, committees, and work groups. The constant report from multiple facilities statewide illustrates the urgent need for additional resources. News and clinical sources regularly report on hospital status exceeding capacity, provider burnout rates, and the dangers associated with rationed care during this state of emergency. Staffing and capabilities may also be affected with Honolulu vaccines mandates.

LifeSave is accessible and available to all citizens and visitors to the State of Hawaii, and all will have access to our emergency medical transport services. LifeSave's services are accessible to all including all racial and ethnic minorities, women, all underserved, low income, elderly, and handicapped; all these persons/groups will have full access to LifeSave's Air and Ground transport services when needed.

- Please see attachments illustrating Need:
 - 9B-1: ATG-Executive Order 21-06
 - 9B-2: Letter from Kaiser
 - 9B-3: EMS1 Article
 - 9B-4: Star Advertiser 9/5/21
 - 9B-5: Star Advertiser 9/4/21

C. Quality of Service/Care

Air Methods is accredited by the Commission on Accreditation of Medical Transport Systems ("CAMTS"). We voluntarily participate in audits every three years to evaluate all aspects of our critical care program. This accreditation is a mark of excellence for a critical care transport program. In addition to accreditation there is a 100% QA review of transports through a quality and risk management system.

LifeSave participates in all the quality metrics in place by the State of Hawaii Board of EMS and trauma system and is assisting in creating new benchmarks in quality. The company is an active

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participant in all local healthcare system quality reviews and initiatives, as well as local EMS education. LifeSave is currently licensed and in good standing with our Ground Ambulance Service License through the State of Hawaii, Department of Health E.M.S. & Injury Prevention System Branch. The ground unit employees, as are our air ambulance medical personnel, are licensed by the State of Hawaii and compliant to all requirements and regulations.

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D. Cost and Finances

LifeSave is already providing ground ambulance services in connection with air ambulance transports under a separate CON. The \$50,000 projected cost and finance through available cash flow would cover incremental operating costs such as staffing, fuel, and medical supplies.

- Please see Attachment 9D-1: Projected 1st and 3rd year profit and loss statement.

E. Relationship to the existing health care system

LifeSave is already well established in the existing health care system with long term relationships and contracts in place, providing options in essential air medical transport. Ground ambulances were added to our transport system in 2020 as a continuation of air transport to the facility and/or airport. The added capability to assist during a time of need for interfacility ground transports will aid in providing patient care and transportation to the right facility at the right time.

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F. Availability of Resources

LifeSave will utilize the critical care medical crews and ground crew for interfacility ground transports when there is a time of need due to crisis and when a crew is not actively on an air ambulance transport. This will improve patient transport availability already in place through other agencies as well as improving 911 ambulance service availability and response times.

In summary, Air Methods Corporation owner and operator of AirMD, LLC dba LifeSave, is confident the emergently granted capability for interfacility ground ambulance transports will benefit all residents and visitors of the State of Hawaii. Those patients needing timely transport during this devastating pandemic surge will benefit greatly from the added resource and critical care clinical professionals.