

II. FISCAL IMPACT ANALYSIS

A. Five Year Summary of Fiscal Impact

Fiscal Years	<u>2026</u>	<u>2027</u>	<u>2028</u>	<u>2029</u>	<u>2030</u>
Personal Services	_____	_____	_____	_____	_____
Operating Costs	_____	_____	_____	_____	_____
Capital Expenditures	_____	_____	_____	_____	_____
External Revenues	(500)	_____	_____	_____	_____
Program Income (County)	_____	_____	_____	_____	_____
In-Kind Match (County)	_____	_____	_____	_____	_____
Net Fiscal Impact	(500)*	_____	_____	_____	_____

ADDITIONAL FTE

POSITIONS (Cumulative)	0	0	0	0	0
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Is Item Included In Current Budget? Yes X No _____
 Is this item using Federal Funds? Yes _____ No X
 Is this item using State Funds? Yes _____ No X

Budget Account Exp No: Fund _____ Dept. _____ Unit _____ Obj. _____
 Rev No: Fund 0001 Dept. 650 Unit 7110 Rev. 2900/4295

B. Recommended Sources of Funds/Summary of Fiscal Impact:

*No additional fiscal impact. A one time application fee was collected. Permit fee of \$150 per unit/vehicle inspected will be charged annually. Fiscal impact will depend on number of vehicles.

C. Departmental Fiscal Review: [Signature] 4/7/26

III. REVIEW COMMENTS

A. OFMB Fiscal and/or Contract Dev. and Control Comments:

[Signature] 4/9/2026
 OFMB OA 418 [Signature]
[Signature] 4/13/26
 Contract Dev. And Control [Signature] 26, 4.13.26

B. Legal Sufficiency:

[Signature] 4/16/2026
 Assistant County Attorney

C. Other Department Review:

 Department Director

This summary is not to be used as a basis for payment.

Continued from page 1.

Summary: In accordance with the Palm Beach County Code, Chapter 13, Article II, Division 1, (EMS Ordinance), Section 13-24(f) upon a finding of Extraordinary Circumstances the BCC may, at any time, grant an extension and/or, modification of an existing COPCN for a period of up to six (6) months which may be renewed. The EMS Ordinance defines Extraordinary Circumstances as meaning substantiated conditions or events such that, in the discretion of the BCC, warrant waiving the normal requirements for extension or modification of a COPCN, as may be required to safeguard and protect the public's health, safety and welfare and ensure continuity of EMS. Based on the EMS Ordinance Administrators review, HCA Florida Palms West has demonstrated the Extraordinary Circumstances qualified to justify the modification of their existing COPCN. The existing HCA Florida Palms West COPCN limits their services to HCA Florida Palms West patients needing transports between HCA Florida Palms West and other medical facilities. The modification request would expand this authority to include patients requiring transport to or from HCA hospitals and HCA hospital based off campus emergency departments located within Palm Beach County. The EMS Ordinance Administrator's responsibilities include reviewing the application for modification of the COPCN, obtaining verification that the applicant meets applicable EMS laws, considering the need for the proposed service, and preparing a report with recommendations for the EMS Advisory Council (Council). The EMS Ordinance Administrator's consideration of the modification request and Extraordinary Circumstances was based primarily on data presented by HCA Florida Palms West demonstrating the requested services address rare but critical situations where immediate patient movement is necessary to protect life, health, and safety, and ensures patient continuity of care while qualified hospital-based transport personnel and equipment are already on site and capable of immediate transport. The EMS Ordinance Administrators report recommending approval of the modification request was submitted to the Council for their review and recommendation. On March 19, 2026, the Council reviewed the EMS Ordinance Administrator's report on the application and heard an oral presentation from HCA Florida Palms West. The Council voted (12 yes 0 no) to deny the requested modification to HCA Florida Palms West. The item was subsequently scheduled for consideration by the Board of County Commissioners on May 5, 2026. At the request of HCA Florida Palms West, the item was postponed by the Board and rescheduled for the June 9, 2026 Board meeting. **Countywide** (SB)

Background and Policy Issues: On February 11, 2025, the BCC approved five (5) additional Secondary Service Providers COPCN's during a special midterm COPCN application process (R2025-0226 through R2025-0230). HCA Florida Palms West was approved for a Secondary Service Provider COPCN and began operations in December 2025. Currently there are a total of eight (8) Secondary Service Providers operating in Palm Beach County. Both HCA Florida Palms West and the Health Care District of Palm Beach County have COPCN's with limited-service area. All current Secondary Service Providers COPCN's expire June 30, 2027.

USA TODAY CO.



Order Confirmation

Not an Invoice

Account Number:	730479
Customer Name:	Pbc Bocc Public Safety
Customer Address:	Palm Beach County Emergency Management 20 S Military TRL West Palm Beach FL 33415-3130
Contact Name:	Lynette Schurter
Contact Phone:	5617126696
Contact Email:	lschurter@pbcgov.org
PO Number:	

Date:	05/19/2026
Order Number:	12347459
Prepayment Amount:	\$ 0.00

Column Count:	1.0000
Line Count:	27.0000
Height in Inches:	2.2400

[Print](#)

Product	#Insertions	Start - End	Category
WPB Palm Beach Post	1	05/30/2026 - 05/30/2026	Public Notices
WPB palmbeachpost.com	1	05/30/2026 - 05/30/2026	Public Notices

As an incentive for customers, we provide a discount off the total order cost equal to the 3.99% service fee if you pay with Cash/Check/ACH. Pay by Cash/Check/ACH and save!

Total Cash Order Confirmation Amount Due	\$91.43
Tax Amount	\$0.00
Service Fee 3.99%	\$3.65
Cash/Check/ACH Discount	-\$3.65
Payment Amount by Cash/Check/ACH	\$91.43
Payment Amount by Credit Card	\$95.08

Order Confirmation Amount	\$91.43
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Ad Preview

NOTICE OF PUBLIC HEARING

Notice is hereby given that a Public Hearing will be held by the Board of County Commissioners of Palm Beach County, Florida, June 9, 2026 at 9:30 a.m. in the Jane Thompson Memorial Chambers, 6th Floor of the Governmental Center, 301 North Olive Avenue, West Palm Beach, Florida, for a modification of current Secondary Service Provider Certificate of Public Convenience and Necessity (COPCN) for Palms West Hospital Limited Partnership d/b/a HCA Florida Palms West, to revise its service area to "patients requiring transport to or from HCA Hospitals and HCA hospital based off campus emergency departments located within Palm Beach County", for the period July 1, 2026 through December 31, 2026.

Board of County Commissioners
Mary Blakeney, Director
Office of Emergency Management
Date: 5/19/26
5/30/26 #12347459

PowerPoint Presentation is still in draft.



MEMORADUM

To: The Honorable Mayor Sara Baxter
and Board of County Commissioners

Through: Mary Blakeney, Director *Mary Blakeney*
Office of Emergency Management

From: Matthew Keeler, Chairperson, Palm Beach County
Emergency Medical Services (EMS) Advisory Council

Date: March 19, 2026

Subject: **Recommendation of Modification to HCA Florida
Palms West Secondary Service Provider
Emergency Medical Services (EMS) Certificate of
Public Convenience and Necessity (COPCN)**

**Office of
Emergency Management**
20 South Military Trail
West Palm Beach, FL 33415
(561) 712-6400
FAX: (561) 712-6464
www.pbc.gov

**Palm Beach County
Board of County
Commissioners**

Sara Baxter, Mayor

Marci Woodward, Vice Mayor

Maria G. Marino

Gregg K. Weiss

Joel G. Flores

Maria Sachs

Bobby Powell Jr.

County Administrator

Joseph Abruzzo

The purpose of this memo is to provide a recommendation to the Board of County Commissioners (BCC) regarding the requested modification of the Secondary Service Provider COPCN held by HCA Florida Palms West which expires June 30, 2027.

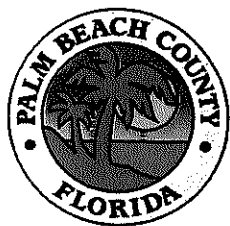
Pursuant to Palm Beach County Code, Chapter 13, Article II, titled EMS Ordinance Section 13-23 – Review and Assessment of Application:

- a) Upon receipt of an application, the Administrator shall review the application and obtain verification that the applicant meets the requirements of all applicable federal, state and local laws. The Administrator's review shall include consideration of the need for the proposed service in the requested area;
- b) Upon finalization of the review, the Administrator shall prepare a report with recommendation, which shall be forwarded to the applicant and to the EMS Council. The Administrator shall schedule an EMS Council meeting to request an EMS Council recommendation on the application to be provided to the Board. The applicant and affected COPCN Holders will be provided with notice of the EMS Council meeting and may be heard concerning the application at the EMS Council meeting prior to the EMS Council recommendation.

On March 19, 2026, the EMS Advisory Council reviewed the application by HCA Florida Palms West to modify their existing Secondary Service Provider COPCN to allow for interfacility transport to or from all HCA hospitals and HCA freestanding emergency departments in Palm Beach County.

"An Equal Opportunity Employer"

Official Electronic Letterhead



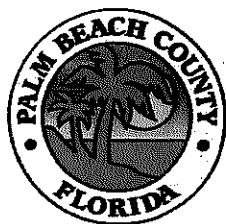
There were twelve (12) Council members present, twelve (12) Council members voted. The EMS Advisory Council voted 12 to 0 to deny HCA Florida Palms West application to modify their COPCN based on no evidence being presented for extraordinary circumstances.

Respectfully,

A handwritten signature in black ink, appearing to read "Matthew Keeler", is written over a horizontal line.

Matthew Keeler, Chairperson
EMS Advisory Council

MEMORANDUM



Office of
Emergency Management
20 South Military Trail
West Palm Beach, FL 33415
(561) 712-6400
FAX: (561) 712-6464
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**Palm Beach County
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Bobby Powell Jr.

County Administrator

Joseph Abruzzo

To: Palm Beach County Emergency Medical Services
Advisory Council

From: Mary Blakeney, Director *Mary Blakeney*
Office of Emergency Management

Date: March 18, 2026

Subject: Palm Beach County Emergency Medical Service
Ordinance Secondary Service Provider Certificate
of Public Convenience and Necessity Application
Modification Summary Report with Recommendations

This memo serves as a summary report with recommendations for the Palm Beach County Emergency Medical Services (EMS) Ordinance Secondary Service Provider Certificate of Public Convenience and Necessity (COPCN) modification application for HCA Florida Palms West.

During the March 3, 2026 Board of County Commission meeting, the Board directed staff to review and bring back information for Board consideration to edit or amend the HCA Florida Palms West COPCN for HCA hospitals in Palm Beach County.

The following Administrator's recommendation will be presented at the EMS Council meeting for your consideration and recommendation to the Board of County Commissioners:

Approval of modification to the Secondary Service Provider COPCN for a period of six months based on extraordinary circumstances:

- **As services address rare but critical situations where immediate patient movement is necessary to protect life, health, and safety.**
- **Ensures patient continuity of care while qualified hospital-based transport personnel and equipment are already on site and capable of immediate transport.**

Based on the information collected through the application modification process, the Administrator's recommendations and a detailed report will be presented at the EMS Advisory Council meeting on Thursday, March 19, 2026.

Please find attached the modified application from HCA Florida Palms West.

Certificate of Public Convenience and Necessity Palm Beach County Emergency Medical Services

WHEREAS, there is a need for Palms West Hospital Limited Partnership d/b/a HCA Florida Palms West to operate and provide essential emergency medical services to the citizens and visitors of Palm Beach County, Florida; and

WHEREAS, said agency has applied to provide these services; and

WHEREAS, said agency has indicated that it meets and will comply with all requirements of Palm Beach County's EMS Ordinance, set forth in Chapter 13, Article II, Division 1, of the Palm Beach County Code, and related Rules, as well as Chapter 401, Part III, Florida Statutes, and Chapter 64J, Florida Administrative Code.

NOW, THEREFORE, the Board of County Commissioners of Palm Beach County hereby issues a Certificate of Public Convenience and Necessity to said emergency medical service provider, valid from July 1, 2026 through December 1, 2026.

In issuing this Certificate, it is understood that the agency named hereon will meet the requirements of all pertinent County and State laws, rules, and regulations, and will provide emergency medical services on a twenty-four hour basis in the designated Area(s), providing the level of service endorsed as follows:



Area(s): Limited to patients requiring transport to or from HCA hospitals and HCA hospital based off campus emergency departments located within Palm Beach County



Service Endorsed: Secondary Provider with the following Endorsements:
Advanced Life Support (ALS) Services
Secondary ALS Transport Services
ALS/Basic Life Support (BLS) Inter-facility Transfer Services

Mary Blakney
Director, Office of Emergency Management



Mayor, Board of County Commissioners

PALM BEACH COUNTY



**DIVISION OF EMERGENCY MANAGEMENT
EMERGENCY MEDICAL SERVICES**



**APPLICATION FOR SECONDARY SERVICE PROVIDER
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY
(COPCN)**

Section 1: (Check one)

_____ Applying for **new** Secondary Service Provider Certificate of Public Convenience and Necessity (COPCN) with Advanced Life Support (ALS) and Basic Life Support (BLS) Interfacility Ground Transfer Endorsement and Secondary ALS/BLS Transport Service Endorsement.

 X Applying for **renewal/revised** Secondary Service Provider Certificate of Public Convenience and Necessity (COPCN) with ALS/BLS Interfacility Ground Transfer Endorsement and Secondary ALS/BLS Transport Service Endorsement.

Specific area(s) or specific community to be covered and services to be provided: (attach additional page if necessary)

Patients requiring transports to or from HCA hospitals and HCA hospitals based off campus emergency departments located within Palm Beach County

_____ This is a modified application from original. Modification date of 03/30/2026

Secondary Service Provider COPCN service start date: June 1, 2026

Section 2: AGENCY INFORMATION

Full legal name of agency Palms West Hospital Limited Partnership d/b/a HCA Florida Palms West

Mailing address 13001 Southern Blvd, Loxahatchee, Florida, 33470

Central place of business Palm Beach County

Phone # 5617983300

Agency is public sector _____ private sector X

Note: The name of the service that is placed on the "Name of agency" line must be identical to the name listed on your COPCN

Chief's / Manager's / Owner's name Matthew Johnson

Medical Director's name David Arboba

Medical Director's business address 119 Oakfield Dr, Brandon FL

Medical Director's Medical License# 140626 Exp. Date 01/31/2027

If applicant is a private sector agency, provide a list of all owners, officers, directors, primary shareholders. Include each person's position/interest and business address. (Please attach separate list referencing question #16.)

Section 3: ATTACHMENTS REQUIRED

Applicants shall submit the application for COPCN as set forth in Chapter 13, Article II, Division I, of the Palm Beach County Code of Laws and Ordinances and satisfy all requirements therein, and in addition, applicants shall also provide satisfactory completion of the following requirements. **Please be sure to include with the Application, as separately numbered Attachments in a three (3) ring binder, the following:**

1. Describe the need and area(s) for the proposed service to be covered by your agency. You must submit copies of supporting data, municipal resolution(s), contractual agreements, and Community Association contracts allowing your agency to provide medical response services to any municipality or community.
2. The financial information of the applicant to ensure financial ability to provide and continue to provide service to the area. Such financial information shall include copies of the applicant's past two (2) Medicare audits, if any. Government entities must provide the past three (3) years Comprehensive Annual Financial Reports via hard copy, or electronically. Privately held entities must provide copies of audited financial statements, if any, of the company and its parent company or holding company if any, for the past three (3) years.
3. Copy of current fee schedule.
4. A summary history of applicant's EMS performance record, if any, for the past three (3) years, including any ALS Transport Service experience, and provide Benchmark Response time data for the previous six (6) months (Form A).
5. The applicant must demonstrate that is general manger or an executive staff member has a minimum of five (5) years of experience in managing ALS Transport Services.
6. Disclosure of litigation involving Patient care, for the past six (6) years which resulted in a judgment, award, or finding in favor of a Patient or the complaining party, including case number, nature of the claim and allegations, and a copy of final judgment or award.
7. Proof of satisfactory completion of all federal, state, and/or local agency vehicle and staff inspections for the last three (3) years including copies of all deficiency reports.

8. Records substantiating the implementation of a formal quality assurance system consistent with Florida Statute Section 401.265 and Chapter 64J-1, Florida Administrative Code, as may be amended.
9. Applicants must have an Emergency Medical Dispatch (EMD) program or an agreement for appropriate EMD service consistent with Section 768.1335, Florida Statutes, titled "The Emergency Medical Dispatch Act", as may be amended.
10. The applicant must provide a certified letter from the COPCN Holder's Chief Executive Operating Office or Fire Chief that the applicant has met all applicable federal, state and local requirements pertaining to the delivery of EMS.
11. Management Plan: Provide information on how the following business functions will be conducted and managed: a) employee and driver training programs, b) complaint handling system, c) system for handling accidents and/or injuries, and d) vehicle maintenance system.
12. Copy of current State Emergency Medical Services (EMS) license(s) and/or current COPCN, if any.
13. The Medical Director must be a Florida licensed physician. Provide a copy of a fully executed contract or agreement. Include copies of current DEA and Florida Physician's License. Must meet requirements of 64J-1.004, Florida Administrative Code, and Section 401.265, Florida Statutes.
14. Copy of standard operating procedures and protocols relating to EMS that have been approved by your Medical Director, and the Medical Director of the Primary COPCN holder.
15. A letter from your Medical Director stating your agency has adopted the State-approved countywide Trauma Transport Protocols.
16. Copy of profile sheet(s) relating to current Florida State license(s), if any, or the equivalent information sheet listing all of the agency's vehicles.
17. The minimum number of ALS Transport Units, ALS Vehicles, and BLS Transport Units that the applicant will have dedicated, operationally available, and fully staffed in Palm Beach County.
18. A list of the names of personnel, and their EMS certifications, certification numbers and expiration dates. Personnel must meet all requirements of certification and training referred to in Chapter 401, Florida Statutes, Chapter 64J-1, Florida Administrative Code.
19. Applicant must have hands free mapping capability, and an automatic vehicle locator system that would allow the Administrator and the requesting facility to track the

location of responding vehicles. The applicant must provide details about all such systems and their capabilities.

20. A memorandum of understanding for radio communications that is executed between the applicant and Palm Beach County through its Public Safety Department.
21. Insurance verification. A copy of an insurance policy, a self-insurance policy, or a Certificate of Insurance is acceptable, so long as the agency meets the minimum insurance limits as required by Section 64J-1, Florida Administrative Code. There must be a 30-day cancellation notice and **Palm Beach County shall be shown as the certificate holder with a mailing address of 301 N. Olive Ave, West Palm Beach, FL 33401.**
22. A non-refundable application fee in the amount of five-hundred dollars (\$500.00) made payable to: "Palm Beach County Board of County Commissioners."

Remainder of This Page Intentionally Left Blank

SECTION 4: AUTHORIZED SIGNATURE

I, the undersigned representative of the applicant Agency, do hereby attest that said Agency meets all the requirements of Palm Beach County Emergency Medical Services (EMS) Ordinance, as codified in the Palm Beach County Code of Laws and Ordinances, and any accompanying Rules and Regulations of the Division of Emergency Management Emergency Medical Services Section, as well as all the requirements for the operation of an emergency service as provided for in Florida Statutes, Chapter 401, Part III, and Chapter 64J, Florida Administrative Code.

I, the undersigned representative of the above applicant Agency, further attest that this Agency is in compliance with the State of Florida EMS Communications Plan.

I, the undersigned representative of the applicant Agency, acknowledge that any discrepancies discovered by the Palm Beach County Emergency Management staff during the annual mandatory inspections may subject my Agency and its representatives to corrective action and possible penalty as provided for by Florida law and applicable Rule. Further, I understand that an annual vehicle inspection permit-fee per-vehicle shall be paid for any EMS vehicle or ambulance utilized in Palm Beach County.

I, the undersigned Agency Representative of the applicant Agency, hereby submit this application on behalf of the applicant Agency, and hereby affirm that I am authorized to submit this application on behalf of the applicant Agency and that, to the best of my knowledge, all statements on the application and the included attachments in support of the application are true and correct.

Palms West Hospital Limited Partnership d/b/a HCA Florida Palms West

Name of Agency

David Jackson

Print or Type Name of Agency Representative

David Jackson

Signature

3/30/2026

Date

**STATE OF FLORIDA
COUNTY OF PALM BEACH**

The foregoing Application was acknowledged before me this 30 day of March, 2026 by David Jackson, who is personally known to me or who has produced _____, as identification and who did take an oath.

Celida Diaz Sheppard
Signature

Notary Seal:



CELIDA DIAZ SHEPPARD
Commission # HH 324009
Expires February 19, 2027

1. *Statement indicating the public need and areas for the proposed services by your agency, including studies, if available, supporting the demonstrated demand and feasibility for the proposed service(s) and deficiencies in existing services and any other pertinent data you wish to be considered.*

Extraordinary Circumstances

HCA Healthcare is experiencing substantiated and ongoing conditions that directly threaten patient safety, continuity of care, and the stability of the local EMS system—meeting the definition of *Extraordinary Circumstances* under Section 13-24(f) of the EMS Ordinance.

The secondary interfacility transport providers serving Palm Beach County are consistently unable to respond in a timely manner or do not have the staffing needs for a set of critically ill patients that are a priority for HCA. Average CCT transport ETAs exceed 49 minutes, with ordinance allowances permitting an additional 15-minute delay before a response is considered late. These prolonged responses times significantly delay the movement of **critical patients**, including those requiring time-sensitive interventions, resulting in extended periods where medically fragile individuals remain in facilities not equipped to provide the level of care their condition demands.

Additionally, private providers frequently require HCA's ED and FSED nurses to leave the bedside and accompany transports—a practice that degrades hospital surge capacity and patient flow. The system is also unable to support specialized transports such as NICU, PICU, ECMO, and other high-acuity cases, which require hospital-credentialed teams that private medical transport agencies cannot provide.

Collectively, these conditions represent a clear and ongoing threat to public health, safety, and welfare, and demonstrate the need for a modification of HCA's COPCN to ensure continuity of EMS and protect the community.

Statement of Public Need for HCA Healthcare's Certificate of Public Convenience and Necessity (COPCN)

The secondary interfacility transport service in Palm Beach County is critically underperforming, resulting in delayed and unreliable patient transfers and placing unnecessary financial strain on patients. The current providers have been unable to consistently meet service expectations, particularly in situations requiring timely response and higher-acuity clinical needs. These delays directly impact patient well-being and safety, as medically vulnerable individuals remain in facilities that may not be equipped to provide the level of care required.

HCA Healthcare has been granted a COPCN with a narrow scope; however, because this authorization does not include all HCA facilities in the Palm Beach market, we must continue to rely on private ambulance providers for interfacility transport. While we use these private services whenever they can meet our needs, they frequently cannot provide the clinical capability, staffing, or response times required to safely move our patients. Since Palms West

was granted the COPCN, it has response times of zero to three minutes of critical transport patients including brain bleeds, ventilated patients, kidney transplant patients, pediatric intensive care patients and neonatal patients. In addition to faster response times, Palms West does not have to remove nurses from the emergency room or staffing off any of the floors.

Additionally, private interfacility transport providers request nurses approx. 65 times a year require from freestanding emergency department (FSED) and main ED nurses to accompany patients during transport when they cannot supply appropriately trained clinical staff. During surge conditions, this practice removes essential nursing resources from the bedside, slowing patient flow, increasing wait times, and reducing the facility's ability to manage high-volume or high-acuity situations. This knock-on effect compromises operational efficiency and places avoidable stress on frontline teams—ultimately affecting patient safety, continuity of care, and overall clinical outcomes.

Hospital-based EMS programs also operate at a significantly higher clinical level than private transport agencies, which is essential for the most complex and high-risk transfers. Many transports within the HCA system involve patients who require specialized, hospital-credentialed teams—such as **NICU and PICU transports, ECMO patients, high-risk cardiac cases, ventilator-dependent individuals, and other critical-care scenarios**. These transports demand clinicians with advanced training, including neonatal nurses, pediatric intensivists, respiratory therapists, and ECMO specialists. Private medical transport providers are not equipped to supply this level of expertise or the specialized equipment required to safely manage these patients in transit. Hospital-based medical transport ensures that the same standard of care delivered inside the facility continues uninterrupted throughout the transport, protecting patient safety and supporting optimal outcomes.

To address these gaps, we are requesting an expansion of the COPCN to include all HCA facilities within the Palm Beach market, with an operational start date of **July 1, 2026**. As a proven leader in delivering high-quality medical care, HCA is well positioned to support the county by providing reliable, clinically appropriate interfacility transport for patients with the highest level of need.

Expanding the COPCN will ensure timely, coordinated transfers, prevent the diversion of critical nursing staff, and—most importantly—enhance patient well-being and safety across the region. This amendment is essential to strengthening continuity of care and supporting the broader healthcare infrastructure in Palm Beach County.

1. HCA Florida Commitment to Critical Transport Needs

Hospitals are ultimately responsible for patient care outcomes across the continuum of care. This responsibility extends beyond the walls of the hospital and includes the period when patients are being transported between healthcare facilities. Because patient condition, monitoring requirements, and clinical risk do not pause during transport, hospitals must ensure that interfacility transfers meet clearly defined clinical and operational standards. HCA has established minimum standards for these transports to ensure appropriate patient monitoring, continuity of care, and timely movement between facilities. Meeting these standards requires reliable operational control of the transport environment, including the personnel, equipment, and clinical protocols involved in the transfer process.

HCA Florida Palms West aims to serve its transport needs, specifically where time-sensitive situations demand a timely response. By expanding our operation with our own ambulances in

Palm Beach County, we can provide rapid, on-demand inter-facility and intra-facility transport to the patients who need it most. When transport times can meaningfully impact on patient satisfaction, clinical outcomes, and reduce healthcare costs to our patients, our ability to manage these critical needs is paramount to ensuring patient outcomes are not compromised.

2. Current Provider's Response to Critical Care

Their Critical Care Transport (CCT) estimated time of arrival for JFK Main, JFK North, and the freestanding emergency departments in Palm Beach County averages **49.2 minutes**. It is important for the Board to note that these are **ETAs—not actual arrival times**—and under current ordinance language, there may be an additional **+30 minutes** added to these estimates before the provider is considered late.

3. Macroeconomic Challenges Impacting Private Ambulance Providers

The private ambulance industry faces significant financial pressures due to stagnant reimbursement rates that have not kept pace with rising operational costs (Orlando E. Rivera 2024). As the primary revenue model is based on per-transport billing, these providers must contend with rising costs for fuel, equipment, and staff, while reimbursement rates—particularly from Medicare and Medicaid—remain relatively flat (Allia Group 2023). This economic challenge has eroded the provider's ability and others to deliver timely service, as they are forced to prioritize financially viable transports. HCA, however, has the operational capacity to absorb these macroeconomic pressures, enabling us to focus on patient care rather than economic survival.

4. Cost Efficiency and Financial Impact

HCA has become a key source of revenue for private ambulance providers due to regulatory requirements, prompt payments, and the lack of co-pays and deductibles. However, private providers sometimes leverage this dependence, delaying or refusing service if payment terms are not fully met, which impacts service reliability and timeliness. By bringing transport services in-house, HCA can prioritize not only cost efficiency—operating at cost and eliminating the need for profit margins—but also ensure dependable, timely transport. This improvement enhances patient throughput times, which are critical to hospital operations. Delays in throughput—especially those caused by inefficient transport, are costly, as they contribute to prolonged bed occupancy, bottlenecked emergency department (ED) operations, and increased patient wait times. These delays can severely strain hospital resources and increase operational costs (American Hospital Association, 2021; Institute for Healthcare Improvement, 2017; The Joint Commission, 2019). Studies show that improving transport efficiency can reduce these costs by optimizing bed turnover and streamlining care delivery, thus benefiting both hospital operations and patient outcomes (Bender et al., 2018).

With an in-house model that mitigates financial and operational constraints, HCA does deliver timely, cost-effective care while meeting the demand for reliable transport. This change benefits both Palm Beach County's residents and visitors by providing a consistent service that private providers often cannot guarantee due to economic pressures.

5. Reinvestment in High-Quality Care and Training

An additional benefit to the patient would not just be having an available ambulance on-site; the EMTs and paramedics assigned to the ambulances will have access to the same training systems that our nurses and physicians do, along with medical equipment designed to work seamlessly within HCA's system. This allows medical transportation crews to provide care within the FSED and during transport, further decreasing the time to transfer patients to an outside vendor while offering a higher level of training and understanding of patients' needs. This level of care would be unique to our service and could not be duplicated outside of our organization.

6. Improving Countywide Ambulance Resources

When HCA has its ambulances in place, the current providers can reinvest those resources back into the healthcare system, potentially improving ambulance transportation availability and performance throughout Palm Beach County. This assists providers by reducing the need for on demand transportation and allows them to continue to provide timely service for scheduled transports. This improves service across the entire county and enhances the medical transportation system for all healthcare systems within the county.

7. The Path Forward: Filling Critical Gaps in Service

The secondary inter-facility transport service in Palm Beach County is failing to meet the critical needs of patients, with unreliable response times and providers that place unnecessary strain on local resources. The goal of this program is not to compete with current providers but to address the critical gaps in interfacility transport services for patients within the community. HCA's commitment is to ensure that no patient's care is delayed due to inadequate transportation or financial hurdles. By stepping in to provide these essential services, HCA will improve patient outcomes and alleviate the strain on Palm Beach County's interfacility medical services. By granting HCA a Certificate of Public Convenience and Necessity, Palm Beach County can ensure that timely patient transfers are prioritized, enhance the overall healthcare infrastructure, and improve outcomes for residents in need of care.

8. The Need for Dedicated Hospital-Based Transport at Freestanding Emergency Departments.

The lack of dedicated transport capability at freestanding emergency departments places may place an undue burden on the local EMS. For this reason—and the additional considerations outlined above, the absence of hospital-based ambulances to service freestanding emergency rooms may introduce operational gaps that should not be overlooked. Ensuring dedicated hospital transport resources is essential to maintaining both patient safety and community EMS readiness.

9. Conclusion

Hospitals are accountable for what happens to their patients from the moment they enter the system until the moment they leave it—and that responsibility doesn't pause when a patient is placed in an ambulance. The period between facilities is often one of the most vulnerable points in a patient's care, and the clinical needs that exist inside the hospital follow the patient onto the transport stretcher. Vital signs still need to be monitored, treatments must continue uninterrupted, and any change in condition requires immediate, skilled intervention.

To safeguard patients during these transitions, HCA has defined clear expectations for how interfacility transports must be conducted. These expectations outline the level of clinical oversight, equipment readiness, and staff competency required to keep patients stable and ensure their care plan continues without disruption.

Achieving this standard means having dependable control over every part of the transport process—from who is providing the care, to the tools they have available to the protocols guiding their decisions. Without this structure, the quality and safety of the patient's journey can vary in ways that put outcomes at risk. Maintaining this level of coordination is not optional; it is a core part of the hospital's duty to protect patients at every stage of their care experience, including the miles traveled between facilities.

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3. Copy of Current Fee Schedule:

Level of Service	HCA FL Palms West Hospital Rates
BLS Non-Emergent	\$426.66
BLS Emergency	\$682.65
ALS Non-Emergent	\$512.13
ALS Emergent	\$810.65
ALS 2	\$1,173.30
SCT	\$1,386.63
Mileage	\$13.74

5. *The Applicant must demonstrate that the general manager or an executive staff member has a minimum of five (5) years of experience in managing an ALS transport Services.*

**Matthew Johnson, Director of Operations
HCA Medical Transport**

Matthew Johnson has over 25 years of experience in ambulance operations and executive-level leadership. Starting his career as a Paramedic in Arizona, he quickly advanced into senior leadership roles, overseeing multimillion-dollar EMS and medical transport divisions across multiple states.

Matthew has extensive expertise in mergers and acquisitions, with hands-on experience in both acquiring and selling medical transportation companies. Most recently, he served as Vice President of Operations for Covalent Health, where he successfully expanded EMS operations into three states. During his tenure, Matthew also held leadership roles with the Florida Ambulance Association, serving as Secretary and President-Elect. In these roles, he collaborated with members of the Florida Legislature on critical issues affecting EMS and reimbursement policies.

Currently, Matthew is the Director of Operations for HCA Healthcare's Medical Transportation division, overseeing multiple operations across Florida and South Carolina. He holds a Bachelor of Science degree from the University of Phoenix.

10. *The Applicant must provide a certified letter from the COPNC's Holder Chief Executive Operating Officer or Fire Chief that the applicant has met all applicable federal, state and local requirements pertaining to the delivery of EMS.*

See Attached



March 9, 2026

Palm Beach County Board of County Commissioners
301 N. Olive Avenue
West Palm Beach, FL 33401

Re: Certified Letter of Compliance with Federal, State, and Local EMS Requirements

Dear Members of the Palm Beach County Board of County Commissioners,

As the Interim Chief Executive Officer of HCA Florida Palms West Hospital, I hereby certify that HCA Florida Palms West Hospital has met and will continue to meet all applicable federal, state and local requirements pertaining to the delivery of Emergency Medical Services (EMS) as stated in our Certificate of Public Convenience and Necessity (COPCN) application.

We remain committed to upholding the highest standards in EMS delivery, prioritizing patient safety and service excellence.

Sincerely,

A handwritten signature in black ink that reads "Nisha Mills".

Nisha Mills
Interim Chief Executive Officer

HCA Florida Palms West Hospital
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Loxahatchee, FL 33470
HCAFloridaHealthcare.com