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HEALTH SERVICES  
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11/8/06 Chris  
cc: Dick + Michel  
PLR

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REFER TO Robert Dattore - OLC  
November 3, 2006

2577

Calvin B. Johnson, M.D., M.P.H.  
Secretary of Health  
Pennsylvania Department of Health  
Health & Welfare Building  
7<sup>th</sup> & Forester Streets  
Harrisburg, PA 17120

Dear Dr. Johnson:

I'm writing in reference to the Sexual Assault Victim Emergency Services' proposed regulations as published in the PA Bulletin on October 21, 2006.

In Section 117.58 Hospitals not providing sexual assault emergency services, there is a requirement for the hospital to "arrange for the immediate transfer of the victim, at no cost, to a hospital in this Commonwealth in close proximity that does provide those services".

I'm concerned hospitals that don't provide sexual assault emergency services will be calling ambulance services to conduct the transfer. If the ambulance service makes the transfer, please explain who will pay the bill. The ambulance service cannot bill the patient because of the proposed regulations. In the regulations, the hospital must reimburse the ambulance service for the transfer. Hospitals must also explore other means of transportation for these patients. The emergency medical services system is designed to serve when needed and appropriate.

If you have any questions, please feel free to call me at (570) 988-3443.

Sincerely,

Ralph J. Cope  
Executive Director