



## CITY OF FULLERTON

City Council Office

Mayor, Fred Jung  
Mayor Pro Tem, Bruce Whitaker  
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October 4, 2022

The Honorable Erick L. Larsh  
Presiding Judge of the Superior Court  
Orange County Grand Jury  
700 Civic Center Drive West  
Santa Ana, CA 92701

RE: Grand Jury Report: *WHERE'S THE FIRE? – Stop Sending Fire Trucks to Medical Calls*

Dear Presiding Judge Larsh:

The Fullerton City Council, City Manager's Office, and Fire Department have reviewed the May 20, 2022 Orange County Grand Jury report, *WHERE'S THE FIRE? – Stop Sending Fire Trucks to Medical Calls*. We thank the Grand Jury for its interest and consideration of the important public issues of Fire and Medical Services. The City of Fullerton is providing the following response, in accordance with California Penal Code Section 933.05 (a) and (b).

### **FINDINGS**

**F1.** *Despite fire departments throughout Orange County having evolved into emergency medical departments, most have not updated their emergency response protocols accordingly, but have simply absorbed emergency medicals into their existing fire response models.*

**Response: The City of Fullerton disagrees wholly with this finding.**

Response time is the absolute priority for emergencies and is key to the survivability of a cardiac event where 4 minutes can determine life or death and for a structure fire which can mean the difference between keeping the fire isolated to the room of origin or contending with flashover which dramatically reduces survivability of the occupants and increases the amount of property damage.

These all-hazard emergency services are deployed using the "closest unit" concept which is based off the GIS location of a fire unit and the amount of traffic at that time of the day. An everyday example of this same technology is the use of ridesharing applications such as Uber or Lyft. Technology enables each of our fire apparatus to be

### **THE EDUCATION COMMUNITY**

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tracked by our dispatch center. When a call comes through the 9-1-1 system, the closest fire unit is immediately dispatched to handle that emergency.

In the case of a medical emergency, the dispatcher utilizes Criteria-Based Dispatch guidelines to determine the level of care required for the patient, the urgency for the care to be given, and specific medical criteria for determining the response. Based upon these guidelines, the Clausen System is then utilized to categorize the medical response into four primary types from the basic to the most severe-Alpha, Bravo, Charlie, and Delta. As the dispatcher continues to ascertain the situation with the calling party, they may increase or decrease the response level. At the end of the day, the determination of the response level is only as good as the information received and often, the situation is worse or more complex upon the fire department's arrival. This can be seen across all types of emergency responses-traffic collisions, structure fires, trench collapse, allergic reactions, cardiac or stroke events, or diabetic incidents. As described above, technology has been leveraged to enable the fire departments to continue to improve their performance and overall response.

The Orange County fire service leadership continually looks for methods to improve fire and medical services to the citizens and businesses in the most cost-effective manner. This collaborative and innovative group demonstrated this best as the men and women of their agencies responded to the thousands of patients who were symptomatic with COVID19 while simultaneously working with the Orange County Health Care Agency to create and deploy a model to have our Firefighter/Paramedics deliver the vaccine efficiently and effectively to thousands of people per day in our densely populated county. These Point of Dispensing sites or PODS, initially started at the fire department training centers located in Anaheim, Huntington Beach, and Irvine and within a short time led to the first public-facing POD at Disneyland. It's important to note, that while the Firefighter/Paramedics were working at the PODs, the fire stations continued to be staffed and respond to emergencies within their jurisdictions. This is one important and relevant example of how the Orange County fire service can pivot to handle a large-scale issue and demonstrates the flexibility of the system and the willingness of those who lead this system.

*F3. ALS staffed ambulances or smaller squad vehicles are often the most appropriate response to medical calls and do not compromise the quality of medical care.*

**Response: The City of Fullerton disagrees wholly with this finding.**

ALS-staffed ambulances maybe smaller but must abide by the same driving laws governing emergency response as larger fire apparatus. Industry standards are to dispatch and respond two licensed Paramedics to the side of a patient as quickly as possible for the best outcome. The FFD staffs and deploys its resources to accommodate any type of emergency in any geographic location of the city. As an all-hazard fire department, it benefits the community to have an emergency response service that is multi-functioning rather than single functioning. Trained, licensed ALS personnel responding on an apparatus with a variety of equipment to handle any



emergency is in the best interest of our citizens because what maybe *most* appropriate is not *always* appropriate.

The City of Fullerton has six fire stations. Each station is manned by four fire personnel. As previously stated, two licensed Paramedics are required to staff an ALS ambulance or squad. If, as suggested, an ALS ambulance or squad responded to a medical incident, the fire engine assigned to the station would remain out of operation due to the reduced staffing until that ALS ambulance or squad returned. While the fire engine is out of service, response times would increase throughout the City as incidents would have to be diverted to neighboring fire stations to respond to any additional emergency incidents, including medical emergencies. Sadly, it is probable that increased response times would result. To avoid the increased response times, the City would have to place two additional Firefighter/Paramedics at each station to ensure that the City would retain the ability to respond to medical incidents and any other call for service without adversely impacting the response times. While this would achieve the desired result for the Grand Jury, it would also result in an almost fifty percent (50%) increase in the City's required staffing. This would double the City's operating expenses for the department. This increase would not be tied to any additional funding or revenue. As such, it would be an increased cost that the City cannot afford. Following the Grand Jury report would effectively create an unworkable dilemma. It could either significantly increase the response times for calls for service or it would force the City to pay money that it cannot afford.

**F4.** *There has been a breakdown of communication and trust between OCEMS and Orange County Fire Chiefs.*

**Response: The City of Fullerton disagrees partially with this finding.**

For decades, OCEMS was trusted because of strong communication, reasonable expectations, and continual collaboration with the Orange County Fire Chiefs. This partnership enabled the emergency medical system to evolve in a respectful manner. The willingness to effectively communicate, collaborate, and allow the Orange County Fire Chiefs to participate in important discussions, prior to establishing policy, has been challenging over the past 3-4 years. This breakdown in communication is not from a lack of effort of the Orange County Fire Chiefs and is the contributing factor that has eroded the trust with OCEMS. Realizing the situation wasn't improving, the Orange County Fire Chiefs requested the creation of an advisory committee to meet with the OCEMS Medical Director to discuss OCEMS policy additions and edits prior to implementation. The ability to have a discussion on the operational components of a policy or new mandated equipment is important for both sides to create the most robust, yet concise policy. This advisory committee is made up of fire department representatives who respect the expertise of the Medical Director and the oversight of the county regulatory agency yet are responsible for providing their own subject matter expertise from the field perspective. While there have been a few regulatory policies discussed and agreed to by this committee, there remains a larger issue of notice and inclusion that would aid in the forward progress of this relationship and the re-building of

trust. In this case, both parties must be humble and open to the discussion to focus on what is best for the EMTs and Paramedics who are the faces of the EMS system. The Orange County Fire Chiefs remain willing and capable of embracing this essential partnership with the leaders of the OCEMS to improve this situation.

**F5.** *Over-deployment of firefighters for medical calls contributes to the current climate of forced hiring and firefighter fatigue.*

**Response: The City of Fullerton disagrees wholly with this finding.**

The FFD is budgeted for a specific number of suppression personnel to deploy on a specific number of fire apparatus to respond to the quantity of incidents within the City on a 24-hour basis. This methodology does not contribute to the force hiring of Firefighters. In order to maintain 24-hour all-hazard emergency service to every geographic location of the City, we may force our Firefighters to work due to vacancies, approved City leave, or mutual aid responses. The higher the number of the aforementioned leaves and the longer the duration, the more often a Firefighter may work which may lead to fatigue. As a not for profit public agency providing emergency services, if we do not maintain the staffing to provide this service, we run the risk of being unable to fulfill our duty to protect the citizens of the City of Fullerton.

**F9.** *OCEMS has the authority and responsibility to inspect all for-profit ambulances operating in Orange County; however, publicly owned ambulances are not automatically subject to OCEMS oversight.*

**Response: The City of Fullerton disagrees partially with this finding**

The FFD is currently engaged in a public/private partnership with a private ambulance provider as it pertains to emergency ambulance transport under the City's obligatory right referenced in Section 1797.201 of the California Health & Safety Code (Division 2.5, Chapter 4, Article 1) and understand that OCEMS will inspect those ambulances which are under contract with the City. In the future, if the FFD deploys city-owned ambulances, the FFD supports similar inspections by OCEMS as a quality control mechanism to validate the overall emergency transport system in Orange County.

## **RECOMMENDATIONS**

**R1.** *As recommended in 2012 and 2014 OCFA Standards of Coverage and Deployment Plans, as well as other studies, the Grand Jury recommends that, by 2024, all Orange County fire agencies utilize criteria-based dispatch protocols and send a single unit response to those incidents triaged as non-live-threatening (BLS).*

**Response: The City of Fullerton will not implement this recommendation as it is not warranted or reasonable.**



Criteria-Based Dispatch has been in place within Orange County Fire Departments for over 20 years. All calls that come in through the 9-1-1 system are screened and put through an Emergency Medical Dispatch protocol approved by the OCEMS Medical Director and reviewed yearly. Criteria-Based Dispatch guidelines are based on the level of care required for the patient, the urgency for the care to be given, and specific medical criteria for determining response.

The FFD regularly sends a single unit response with a private ambulance to most medical incidents. Incidents that have been identified as needing additional support, such as a traffic collision with injuries where extrication of the patient(s) maybe warranted are provided additional units; otherwise, the closest and most appropriate single all-hazard fire unit is dispatched to emergency medical incidents. Responding units are updated while responding to the incident; however, the unit has already been enroute since moments after the 9-1-1 call was received. If the incident is determined to be non-life threatening, the unit's response is "downgraded." Many times, units already enroute to a medical incident are "upgraded" for reasons such as a cardiac arrest, stroke, or extreme allergic reaction where a single minute may determine the difference from saving a life or not. Allowing units to remain in quarters and holding dispatch, can be the difference between life and death of a patient. Further, the City will not sacrifice patients' lives and/or safety for an unnecessarily restrictive view of the "best" deployment model.

*R4. While OCEMS should recognize how certain policy changes may pose operational challenges to emergency responders in the field, fire leadership should recognize and respect the independent oversight authority and expertise of OCEMS.*

**Response: The City of Fullerton has implemented this recommendation (reference F4 response).**

The FFD understands and respects the medical expertise and necessary oversight of OCEMS, but as one of the paramedic service providers delivering emergency medical services, there must be a mutual respect and a willingness to validate how a policy is understood and implemented in the field. This collaborative partnership fosters the most concise policies which benefits the patients. Fire leadership will continue to encourage common ground and mutual respect in hopes that the same will be embraced by OCEMS leadership.

*R5. Departments with publicly owned ambulances should allow OCEMS to inspect their ambulances for compliance with State EMS guidelines and adopt OCEMS recommendations.*

**Response: The City of Fullerton will not implement this recommendation because it is not applicable.**


The City of Fullerton does not own or operate any publicly purchased ambulances.

The City of Fullerton Fire Department is a dynamic organization which continually evaluates the methods by which it provides fire and emergency medical services to our community. However, our current, all-risk delivery model is appropriate for the complexities of our city and the needs of our citizens and businesses. We are proud of the high-quality service we provide consistently to our customers 24 hours a day.

Respectfully,

A handwritten signature in blue ink, appearing to read "Fred Jung", written over a horizontal line.

Fred Jung  
Mayor

A handwritten signature in blue ink, appearing to read "Adam Loeser", written over a horizontal line.

Adam Loeser  
Fire Chief