

DEPARTMENT OF HEALTH SERVICES  
COUNTY OF LOS ANGELES

SUBJECT: **PRIVATE PROVIDER WATER AMBULANCE** (EMT, PARAMEDIC, MICN)  
**CATALINA ISLAND INTERFACILITY TRANSPORT** REFERENCE NO. 426

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**PURPOSE:** To establish standards, procedures, and operational requirements for the safe and effective interfacility transport of patients by watercraft within Los Angeles County to ensure continuity of care, patient safety, and regulatory compliance when marine transport is necessary due to geography, access limitations, or operational need.

**AUTHORITY:** Health & Safety Code, Div. 2.5, Sections 1797.204, 1797.220, 1798.2, 1798.101(b)(1)  
California Code of Regulations, Title 13, Division 2 - Chapter 5: Article 1  
California Code of Regulations, Title. 22, § 70649 & § 100094.02  
Code of Federal Regulations (CFR) Title 33, 46, 47, & 49  
Los Angeles County Code, Title 7 Div 2, Chapter 7.16, Ambulances

**DEFINITIONS:**

**Certificate of Documentation with Coastwise Endorsement:** Registration for vessels over 5 net tons used in commercial operations, authorizing transport of passengers or merchandise between US points in coastwise trade.

**Commercial Service:** Transportation of passengers or goods between points in the United States for economic gain.

**Emergency Medical Condition:** A condition or situation in which an individual has an immediate need for medical attention. The presence of abnormal vital signs (heart rate and rhythm, respiratory rate, blood pressure – except isolated asymptomatic hypertension, oxygen saturation) are also indications of an emergency medical condition. Patients who meet any criteria for Base Contact or Receiving Hospital Notification are also considered to have an emergency medical condition.

**Health Facility:** A health facility may include, but not limited to, any of the following:

- General Acute Care Hospital
- Skilled Nursing Facility
- Clinic/Urgent Care Center
- Physician Office
- Dialysis Center
- Intermediate Care Facility
- Acute Psychiatric Facility

**Interfacility Transfer (IFT):** The transport of a patient from one health facility to another health facility as defined above. For the purposes of this policy, transport options for IFTs involve the use of authorized ground, air and water ambulance transport vehicles.

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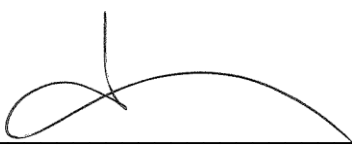
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REVISED:

SUPERSEDES:

APPROVED:   
Director, EMS Agency

  
Medical Director, EMS Agency

**Passenger:** an individual other than the owner, master, captain, or crew, who is carried on a non-recreational vessel.

**Patient:** A person who seeks or appears to require medical assessment and/or medical treatment.

**Vessel Safety Check:** A comprehensive inspection performed by the United States Coast Guard Auxiliary to assess the safety and compliance of vessels with the applicable laws, regulations, and recommended practices.

**Water Ambulance:** A specially equipped and appropriately staffed watercraft authorized and designated by the EMS Agency to transport sick or injured people and provide medical care while traveling on the water that is designed and outfitted with medical equipment and safety gear so patients can be monitored and receive necessary medical treatment while being transported to a designated appropriate medical facility.

**Water Ambulance Transport:** The transport of a patient on a designated water ambulance operated in accordance with applicable maritime and EMS policies and procedures.

**PRINCIPLES:**

1. The Los Angeles County EMS Agency is the regulatory authority responsible for the development of policies and procedures for local EMS transport. Water ambulances operating in Los Angeles County must be classified and authorized by the EMS Agency to provide interfacility patient transport.
2. Water ambulance providers (excluding public agencies) that provide or make available watercraft transport shall adhere to all applicable federal, state, and local statutes, ordinances, policies, and procedures related to water ambulance operations, including qualifications of crew members and vessel maintenance.
3. Planned and structured initial and recurrent training programs specific to the water ambulance service mission and scope of care of the medical crew must be ensured and documented for all regularly scheduled water ambulance crew members.
4. Any privately owned/operated water ambulance service providing services in Los Angeles County shall be licensed in accordance with Los Angeles County Code, Chapter 7.16, Ambulances.
5. Water ambulance transport may be used when a patient requires ambulance-level medical care or monitoring and a reasonable transport time to a receiving facility can be achieved by water OR if air transport is unavailable, contraindicated by weather, landing zone, or other safety concerns or would result in a significant delay compared with boat transfer.
6. A water ambulance shall only be used for patient transport at the level of care which the boat has been authorized to provide.
7. A water ambulance shall only be authorized for interfacility transportation.
8. Authorization of a water ambulance shall be limited to less than six passengers.

9. All water ambulance transports shall include an interface with Catalina Island Medical Center, Avalon Fire, and Los Angeles County Fire for patient transportation on Catalina.

POLICY:

I. General Provisions

- A. No person or organization shall provide or hold themselves out as providing water ambulance services unless that person or entity has been authorized and designated by the EMS agency as a water ambulance provider.
- B. The EMS Agency shall maintain an inventory of designated water ambulance providers. This inventory shall include, but not be limited to, the number and type of authorized water ambulances, the patient capacity of each water ambulance, and the level of patient care authorized to be provided by water ambulance personnel for each authorized water ambulance provider.
- C. Each designated water ambulance provider shall submit monthly data on all interfacility transports utilizing an EMS Agency approved data reporting template developed by the provider. Data is due no later than 25 calendar days after the end of each month.
- D. Water ambulance providers shall be responsible for arranging ground ambulance transportation by a Los Angeles County licensed ambulance operator from the water ambulance docking area to the designated receiving medical facility.

II. Water Ambulance

- A. Motorized boats used as a water ambulance shall be less than 100 gross tons and carry no more than 6 passengers.
- B. Vessels shall meet all applicable federal, state and local requirements for licensing, operation, safety, and equipment as outlined in:
  - 1. Title 46 CFR- Subchapter C - Uninspected Passenger Vessels.
  - 2. Title 33 CFR- Navigation and navigable waters.
  - 3. State of California Division of Boating and Waterways - Special Requirements for Passenger Vessels.
  - 4. City of Avalon, Two Harbors, and Port of Los Angeles Harbor and Navigation codes.
  - 5. International Maritime Association Convention on the International Regulation for Preventing Collision at Sea (COLREGS).
  - 6. California Code of Regulations, Title 13 Division 2 - Chapter 5 Article 1- Special Vehicles: Ambulances.
  - 7. Los Angeles County Code, Title 7 Div 2, Chapter 7.16, Ambulances.

- C. All water ambulances shall maintain a current valid Certificate of Documentation with a coastwise endorsement from the United States Coast Guard.
- D. All water ambulances shall undergo a vessel safety check (VSC) by a United States Coast Guard Auxiliary Vessel Examiner. Proof of VSCs shall be submitted to the EMS Agency for approval to begin operation, and proof of a current valid VSC decal shall be maintained on file with the EMS Agency and renewed annually.
- E. Insurance
  - 1. Providers who transport patients on a water ambulance must maintain all appropriate insurance coverage which must at minimum include:
    - a. Commercial General Liability.
    - b. Automobile Liability.
    - c. Professional Liability.
    - d. Worker's Compensation.
    - e. Employer's Liability.
    - f. Hull & Machinery insurance on each vessel for physical damage up to its declared valuation.
    - g. Protection & Indemnity for all liabilities arising from the vessel operation (including liability to Jones Act crew, third parties on board and wreck removal).
  - 2. If a water ambulance provider utilizes leased employees, or, is an employee leasing or temporary staffing firm or a professional employer organization (PEO), coverage also shall include an Alternate Employer Endorsement naming the County as the Alternate Employer, and the endorsement form shall be modified to provide that County will receive not less than thirty (30) days advance written notice of cancellation of this coverage provision.
  - 3. Complete insurance requirements for operating a water ambulance in Los Angeles County are identified in a separate attachment.

F. Licensure – Operator/Vessel

Every water ambulance operator shall procure and maintain an ambulance operator's license and pay an annual operator and ambulance license fee in the amount set forth in Section 7.14.010 of County Code under the appropriate heading in order to operate in any incorporated city or unincorporated area of the county.

- G. All water ambulances shall carry a minimum of a satellite phone and 2 (two) very high frequency (VHF) radios. One radio must be a fixed-mount VHF with digital selective calling (DSC), AIS equipped and MMSI registered and programmed. The second radio must be a 5 watt or higher waterproof, floating handheld VHF radio, preferably with DSC. All radio equipment is subject to FCC regulations regarding vessel size and passenger load.

H. Equipment

All water ambulances shall be equipped with the minimum required medical equipment and supplies which the provider and the water ambulance is authorized for (BLS, ALS, SCT) the level of care required.

I. Patient Compartment

1. All water ambulances shall have a patient compartment covered on all sides with sufficient space to access patients head, torso and lower extremities while on the litter/cot.
2. The entry and opening of the patient compartment shall be large enough to safely load and unload the patient without excessive lifting angles or obstruction.
3. The patient compartment must have a mounting system to secure at least one patient litter or cot, raised at least 12 inches off the floor to allow working space and reduce exposure to water on deck.
4. The litter/cot must be fitted or accompanied by restraint straps at the chest, waist, and legs to keep the patient secure during vessel motion and sudden maneuvers.
5. Handrails or grab points shall be available around the patient compartment to stabilize both crew and patient in rough conditions.
6. The patient compartment must allow at least one EMS provider to be positioned at the patient's head and another along the side, without blocking exits.
7. Water ambulance patient compartment shall maintain functioning climate control (heating/cooling) for patient comfort and safety.

J. Operations

1. The crew shall conduct and document predeparture safety operation and emergency checklist following the standards outlined in 46 CFR Subchapter C §26.03 and Tach 1 & 2, including but not limited to:
  - a. communication systems,
  - b. weather hazards
  - c. life jackets
  - d. medical equipment
  - e. patient securing systems.

2. All water ambulance transports shall include an interface with Catalina Island Medical Center, Avalon Fire, and Los Angeles County Fire for patient transportation on Catalina.
3. The patient shall be secured to a stretcher or appropriate device, which is itself secured to the vessel to prevent movement.
4. All EMS personnel and the patient must wear appropriately fitted personal flotation devices unless this clearly interferes with critical life-saving procedures.
5. Prior to departure, EMS crew will notify dispatch and the receiving facility of patient condition and estimated time of arrival.
6. Continuous or specific interval communication with dispatch shall be maintained during transport as applicable.
7. Quarterly drills shall be performed covering the following operational areas by the Captain with the deckhand(s), additional crew and medical crew:
  - a. Fire Drill: Simulate a fire (e.g., engine compartment), practice donning gear, deploying extinguishers, and shutdown procedures.
  - b. Abandon Ship Drill: Don life jackets, deploy life raft or dinghy, muster at designated points, and practice boarding. Test alarms and radio distress calls.
  - c. Man Overboard (MOB) Drill: Mark position, return to "victim," practice recovery using throw lines or boarding ladder.

K. Incidents

1. All incidents shall follow the notification and documentation requirements and procedures outlined in 46 CFR Part 4.
2. In addition to the Coast Guard reporting, the EMS Agency shall be notified immediately.

III. Crew

- A. Captain/Operator - required to possess a current valid Operator of Uninspected Passenger Vessel (OUPV) license from the US Coast Guard for vessels under 100 gross tons carrying less than 6 passengers.
- B. Deckhand(s) - One qualified crew member, at a minimum, in addition to the operator and medical crew shall be onboard to assist in operation of the vessel and equipment and help handle onboard emergencies including protection and evacuation of passengers.
- C. Medical Crew
  1. A minimum 2 licensed/certified/accredited EMS clinicians (EMT, Paramedic, or qualified MD or RN) on board during patient transport, in

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compliance with Ref No. 517 for interfacility transport.

2. Medical crew shall complete an initial and annual course which addresses the elements identified in Section III.E.1-3. of this policy or complete and maintain certification from a course approved by the National Maritime Center in accordance with Standards of Training Certification and Watchkeeping, Basic Training (STCW BT).
  - D. Marine safety drug testing requirement - the captain/operator and any crew member (deckhand(s) and medical crew) with duties that affect safe operation including engine navigation, line handling, passenger safety, or assisting passengers with emergencies shall comply with all drug testing requirements from 46 CFR Parts 4 and 16, 49 CFR Part 40 and 33 CFR Part 95.
  - E. The vessel captain and deckhand crew shall be trained and maintain current certification in a course approved by the National Maritime Center in accordance with Standards of Training for Certification and Watchkeeping, Basic Training (STCW BT) to include the following:
    1. Personal Survival techniques
    2. Personal Safety and Social responsibility
    3. Basic Firefighting
    4. Basic First aid and CPR
- IV. Patient Eligibility
- A. Must be medically stable for marine environment as determined by the on-site referring/sending physician.
  - B. Online medical control must be available in the event of an unexpected deterioration in patients' condition.
  - C. Must be accompanied by appropriate medical personnel based on medical condition.
- V. Quality Improvement (QI)
- A. At minimum, the QI program shall include: (Refer to Ref. No. 620)
    1. A statement of QI program goals and objectives.
    2. A description of how the QI program is integrated into the organization.
    3. A description of those processes used in conducting QI activities, action plans and results.
    4. Methods to document those processes used in QI activities.
    5. Methods used to retrieve data regarding patient care and outcomes.
    6. Description of how the QI program is integrated into the Los Angeles County EMS system.

B. Provider Agency Responsibilities:

1. Implement and maintain a Quality Improvement (QI) Program in conjunction with the assigned base hospitals and receiving hospitals.
2. Evaluate prehospital care/interfacility transport performance standards.
3. Designate a representative to participate in the LA County EMS QI program.
4. Records of QI activities shall be maintained by the provider and available for review by the EMS Agency.
5. Ensure a patient care record is completed for every IFT response regardless of patient disposition and available for review by the EMS Agency.

CROSS REFERENCES:

Prehospital Care Manual:

Ref. No. 426.1 **Private Provider Water Ambulance Insurance Requirements**  
Ref. No. 502, **Patient Destination**  
Ref. No. 517 **Private Provider Agency Transport/Response Guidelines**  
Ref. No. 517.1 **Guidelines for Determining Interfacility Level of Transport**  
Ref. No. 520 **Transport/Transfer of Patients from Catalina Island**  
Ref. No. 520.1, **Catalina Island Medical Center (AHM) Transfer/Transport Process**  
Ref. No. 606 **Documentation of Prehospital Care**  
Ref. No. 703.1 **Private Provider Interfacility Transport ALS Unit Inventory**  
Ref. No. 710 **Basic Life Support Ambulance Equipment**  
Ref. No. 712 **Nurse Staffed Specialty Care Transport Unit Inventory**  
Ref. No. 713 **Respiratory Care Practitioner Staffed Specialty Care Transport Unit Inventory**

Code of Federal Regulations (CFR):

**Title 33 CFR Subchapter C and part 95**  
**Title 46 CFR Subchapter C**  
**Title 46 CFR Subchapter C §26.03 and Tach 1 & 2**  
**Title 46 CFR §11.302 and parts 4 and 16**  
**Title 47 CFR Telecommunication**  
**Title 49 CFR Part 40**

**Emergency Medical Treatment and Labor Act (EMTALA)**