



**DIVISION OF INSPECTOR GENERAL**  
Ken Burke, CPA  
Clerk of the Circuit Court and Comptroller  
Pinellas County, Florida



# AUDIT OF SUNSTAR AMBULANCE CONTRACT



**Sunstar**  
PARAMEDICS



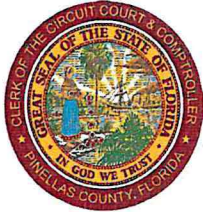
**Pinellas  
County**  
SAFETY AND  
EMERGENCY SERVICES



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REPORT NO. 2024-03  
March 6, 2024



## Ken Burke, CPA

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PINELLAS COUNTY, FLORIDA

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March 6, 2024

Jim Fogarty, Bureau Director, Department of Safety and Emergency Services

We have conducted an audit of the Sunstar Ambulance Contract based on our annual risk assessment.

Opportunities for Improvement are presented in this report.

We appreciate the cooperation shown by the staff of the Safety and Emergency Services Department during the course of this review.

Respectfully Submitted,

*Melissa Dondero*

Melissa Dondero  
Inspector General/Chief Audit Executive

Approved:

*Ken Burke*

Ken Burke, CPA\*  
Clerk of the Circuit Court and Comptroller  
Ex Officio County Auditor

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cc: The Honorable Chair and Members of the Board of County Commissioners  
Barry Burton, County Administrator  
Lourdes Benedict, Assistant County Administrator  
Kevin Knutson, Assistant County Administrator  
Joseph Lauro, Director, Department of Administrative Services



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# INTRODUCTION

## *Abbreviations*

<b>ALS</b>	Advanced Life Support
<b>BLS</b>	Basic Life Support
<b>Contract</b>	Paramedics Logistics Florida/Sunstar Ambulance Service Contract
<b>County</b>	Pinellas County
<b>EMS</b>	Emergency Medical Services
<b>EMT</b>	Emergency Medical Technician
<b>FTE</b>	Full-Time Employee
<b>SES</b>	Department of Safety and Emergency Services

## Executive Summary

As part of our annual audit plan, we conducted an audit of the Paramedics Logistics Florida/Sunstar Ambulance Service Contract (contract) and the contract monitoring operations conducted by the Department of Safety and Emergency Services (SES) from October 1, 2017, through September 30, 2023.

The objectives of the audit were to:

1. Determine whether contractual obligations (performance standards) were met by Sunstar and reviewed by Pinellas County (County) management
2. Determine whether payments requested by and disbursed to Sunstar were accurate and appropriate

Through discussions with the SES Divisions of Finance and Emergency Medical Services (EMS)/Fire Administration management, we obtained an understanding of the monitoring processes regarding the following contractual categories:

- Medical staffing levels of Paramedics and Emergency Medical Technicians (EMT)
- Emergency and non-emergency response times
- Medical staffing scheduled within each transport
- Inventorying of emergency vehicles
- Monthly disbursements regarding transport volume, additional services/equipment, and applicable liquidated damages

Overall, we noted two issues in which Sunstar did not satisfy the obligations set forth in the contract with the County. We identified issues regarding medical staffing levels and emergency/non-emergency response times.

For fiscal years 2022 and 2023, Sunstar was not consistently compliant with the contractual response times for countywide emergency/downgraded transports, non-emergency transports, and EMS District emergency/non-emergency transports, as shown below:

<b>Category</b>	<b>Compliance Rate</b>
<i>Emergency/Downgraded (Countywide)</i>	<b>0%</b>
<i>Non-Emergency</i>	<b>91.67%</b>
<i>EMS Districts (Average)</i>	<b>42.96%</b>

For fiscal years 2022 and 2023, we recalculated Paramedic and EMT full-time employee (FTE) contract minimums and identified concerns regarding Paramedic staffing levels. On average, Paramedics were staffed 11.1% below the minimum number of Paramedics contractually required to be employed by Sunstar.

Furthermore, we reviewed and tested controls regarding vehicle transport staffing, emergency vehicle inventory, and monthly disbursements relating to transport expenses. These controls

were tested based on the criteria documented within the Sunstar contract, medical control directives, and procedures conducted by SES management. We determined that the controls in place regarding the monitoring of vehicle transport staffing, emergency vehicle inventory, and monthly disbursements of transport expenses were adequate.

SES management supplied data of all Sunstar transports between October 1, 2020, and September 30, 2023, including Advanced Life Support (ALS), Basic Life Support (BLS), Critical Care, and Mental Health transports. The data included the reason for the applicable late response and the medical crew initially scheduled within the emergency vehicle for each transport type. Using data analytics, we summarized the call type and crew member title to determine the accuracy of the medical crew scheduled within each applicable transport.

In addition, patient care reports were reviewed to support each transport to ensure all medical staff allocated to the emergency medical vehicles were documented and appropriate. We concluded that the medical transport staff stated within the patient care reports accurately recorded the medical staff contractually required to successfully care for and transport County residents and visitors.

SES's Division of EMS and Fire Administration communicates with Sunstar to update the list of operable and inoperable emergency vehicles. This listing is consistently monitored by EMS and Fire Administration staff to ensure Sunstar maintains the appropriate number of vehicles contractually required. We did not identify any specific concerns related to the monitoring of the emergency vehicle inventory.

Lastly, we reviewed Sunstar's monthly invoices regarding monthly base transport volume, workforce stabilization (recruit, train, and maintain employees), additional services/equipment, and deduction of liquidated damages due to late response times and medical staffing compliance. As a result, we determined that monthly billings submitted to SES Finance were accurate and appropriate controls were in place to monitor contractual expenditures and approve payments to Sunstar promptly.

## ***Background***

### ***Sunstar***

Sunstar has been serving the Pinellas County (County) community since 1998. Sunstar follows patient care protocols set by their physician medical director based on the most current industry standards and survival data. Sunstar first responders obtain guidance from a medical doctor when responding to emergencies if required. Sunstar also works closely with each receiving hospital to evaluate patient outcomes for specific emergencies such as heart attacks, strokes, and other serious problems. Sunstar then uses this data to continually improve its treatment protocols and identify the closest, most appropriate hospital to transport patients to receive the best quality of care.



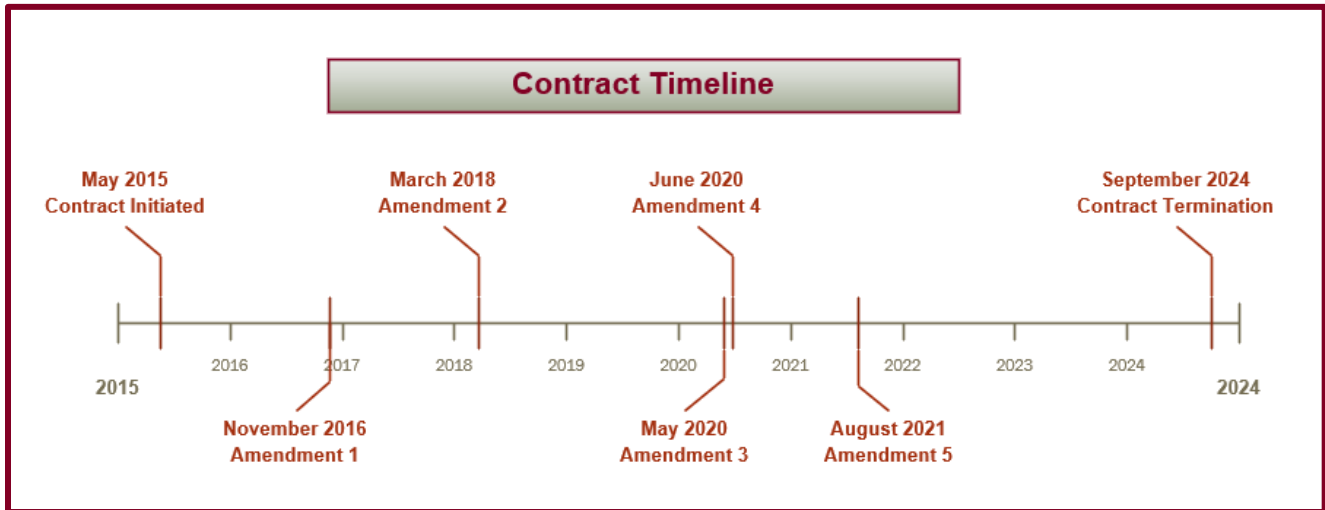
Sunstar is utilized to respond quickly and safely when residents and visitors have a medical need anywhere in the County. Local fire stations are staffed by Paramedics who are ready to provide a quick response and on-scene patient care during medical emergencies. Sunstar Paramedics offer continued care during ambulance transportation to hospitals. Those ambulances are equipped to provide the standard of care required for the most serious medical emergencies. Sunstar partners with the American Heart Association to learn new innovations for emergency medical response.

### ***Pinellas County***

#### ***Department of Safety and Emergency Services***

In 2015, the County continued the contractual partnership with Paramedic Plus to operate ambulance services under the County's trade name, Sunstar Paramedics. The Paramedics Logistics Florida/Sunstar Ambulance Service Contract (contract) includes but is not limited to, requirements regarding invoice payments, vehicle inventory maintenance, vehicle medical staffing, and compliance regarding staffing levels and transport response times.





The contract milestones include the following information:

- *Contract Initiated:* Entered into a 5-year contract to provide the County with Advanced Life Support (ALS) ambulatory services.
- *Contract Amendment 1:* Added Basic Life Support (BLS) services and modified the Continuing Medical Education training monitoring process.
- *Contract Amendment 2:* Entered into a consent-to-assignment (Paramedic Plus conducts all services of the contract unless authorized by the County).
- *Contract Amendment 3:* Eliminated the requirement for Paramedic Plus to provide Tactical Emergency Medical Services (EMS) services.
- *Contract Amendment 4:* Entered into a 3-year contract extension and completed mutually agreed improvements.
- *Contract Amendment 5:* Entered into a 3-year contract related to stabilizing the workforce through salary increases to reduce employee turnover.
- *Contract Termination:* The contract terminates on September 30, 2024.

The Department of Safety and Emergency Services (SES) provides operational monitoring and financial services for the Sunstar contract through the following two Divisions:

- *Financial Services:* Provides the ambulance billing for each Sunstar ambulance transport and handles financial and budgetary needs for all other Divisions within SES.
- *EMS and Fire Administration:* Coordinates the emergency medical and fire needs of more than one million residents and visitors in the County.

SES is responsible for managing the daily operations of the EMS System on behalf of the EMS Authority Special District. The EMS Medical Director works with the EMS Authority under a contract to provide clinical oversight and leadership to the entire EMS system and all service providers.



### Division of Financial Services

The Division of Financial Services is responsible for the review and approval of two monthly Sunstar invoices regarding the following transport and reimbursement services:

#### Invoice 1

- Base Transport Services
- Critical Care Transport Base Services
- Mental Health Transport Base Services
- Workforce Stabilization Fee

Due to the tribulations of COVID-19, the medical workforce was significantly impacted, and Sunstar could not employ and retain employees to fulfill the contract. In October of 2021, Sunstar and the County agreed to amend the contract to include Workforce Stabilization Funding provided by Sunstar and the County. Sunstar utilized the funding to increase the wages of Paramedics, Emergency Medical Technicians (EMT), and Registered Nurses assigned to field operations, communications, specialty transport teams, field supervision, and communications supervision.



#### Invoice 2

- Stop-Loss (number of transports that exceed the base services of 10,400 monthly transports)
- Reserve Critical Care Transports
- Dedicated Standbys
- Long Distance Transports
- Mental Health Transports/Logistics Support/Disaster Vehicle Operations
- Paramedic and EMT Staffing Penalties
- Response Time Penalties
- Medical Supply Reimbursement

### Division of EMS and Fire Administration

EMS and Fire Administration is responsible for monitoring contractual obligations detailed within the Sunstar contract by ensuring operations are completed as required, including, but not limited to, medical staffing per vehicle, emergency vehicle inventory, and response time compliance.

Sunstar's services provide emergency and non-emergency ambulance transportation, including transportation between hospitals and other medical facilities. Sunstar is contractually required to maintain 107 vehicles within its fleet, which includes the following:

- 74 ALS ambulances

- 20 BLS ambulances
- 2 Critical Care transports
- 2 Mental Health transports
- 6 Supervisor transports
- 2 Medical Supply transports
- 1 Fleet Pickup

## ***Transports and Expenditures***

Between October 1, 2017, and September 30, 2023, Sunstar transported 1,096,566 County residents and visitors, which averaged 182,761 transports each fiscal year. During this period, the County paid Sunstar \$350,002,006.29, which averaged \$58,333,667.72 each fiscal year.

Invoices 1 and 2, which we reviewed during the engagement, accounted for 98.02% of payments made to Sunstar during the review period. The remaining payments to Sunstar, totaling \$6,914,250.66, were regarding employee training and applicable COVID-19 expenses.

<b><u>Fiscal Year</u></b>	<b><u>Number of Transports</u></b>	<b><u>Invoice 1 and 2 Payments</u></b>	<b><u>Total Payments</u></b>	<b><u>% of Invoice 1 &amp; 2 Payments</u></b>
2018	179,883	\$52,685,854	\$52,773,751	99.8%
2019	183,947	55,216,852	55,329,144	99.8%
2020	172,573	52,583,707	56,142,757	93.7%
2021	177,849	52,973,149	55,208,509	96.0%
2022	187,817	62,533,195	63,162,880	99.0%
2023	194,497	67,094,999	67,384,965	99.6%
<b>Total</b>	<b>1,096,566</b>	<b>\$343,087,756</b>	<b>\$350,002,006</b>	<b>98.0%</b>
<b>Annual Average</b>	<b>182,761</b>	<b>\$57,181,293</b>	<b>\$58,333,668</b>	<b>98.0%</b>

# SCOPE AND METHODOLOGY

We have conducted an audit of the Paramedic Plus/Sunstar Service Contract over the controls regarding monitoring contract compliance requirements, analysis of actual performance metrics, and disbursement of payments to Sunstar.

The audit period was October 1, 2017, through September 30, 2023. However, we did not limit the review of transactions and processes by the audit period and scope.

During the audit, we performed the following:

1. Evaluated the volume of emergency vehicles to ensure contractual vehicle inventory obligations were met.
2. Utilized data analytics to verify adequate medical staffing was provided for each transport unit.
3. Verified staffing levels were appropriately calculated and maintained to ensure maximum efficiency and adherence to contractual requirements.
4. Assessed emergency and non-emergency response times to ensure contract compliance rates were achieved and documented.
5. Analyzed monthly compensation to Sunstar to ensure rates were calculated appropriately, which included:
  - Monthly base transport volume
  - Workforce stabilization (recruit, train, and maintain employees)
  - Additional services and equipment
  - Deduction of liquidated damages (amounts deducted by the County for not meeting performance standards)
  - Timeliness on both parties (receipt of invoice and disbursement of payment)

# OBJECTIVES AND OUTCOMES

The objectives of the audit were to:

1. Determine whether contractual obligations (performance standards) were met by Sunstar and reviewed by Pinellas County (County) management
2. Determine whether payments requested by and disbursed to Sunstar were accurate and appropriate

As a result of the audit, we determined:

1. Sunstar did not meet contractual obligations (performance standards) regarding ambulance response timeliness and staffing requirements. However, we determined that County management consistently monitored the performance standards outlined within the contract.
2. Vehicle inventory maintenance, vehicle medical staffing, and payments requested by and disbursed to Sunstar were accurate and appropriate.

Our audit was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* and the *Principles and Standards for Offices of Inspector General* and, accordingly, included such tests of records and other auditing procedures as we considered necessary in the circumstances.

# OPPORTUNITIES FOR IMPROVEMENT

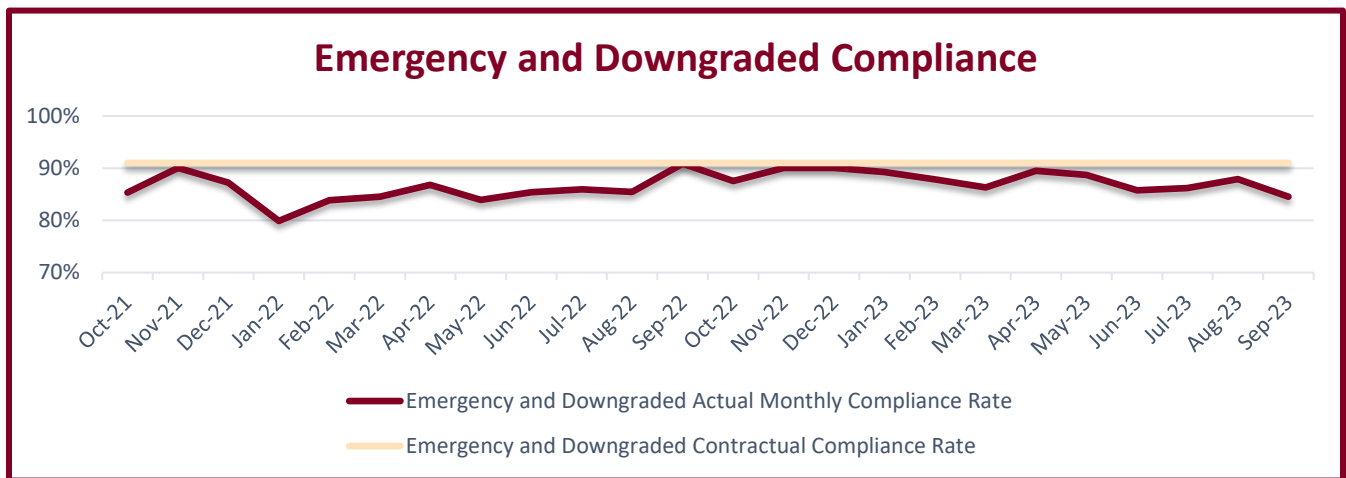
Our audit disclosed certain policies, procedures, and practices that could be improved. Our audit was neither designed nor intended to be a detailed study of every relevant system, procedure, or transaction. Accordingly, the Opportunities for Improvement presented in this report may not be all-inclusive of areas where improvement may be needed.

## 1. Response Time Compliance

From October 1, 2021, through September 30, 2023, Sunstar did not meet contract requirements regarding response time compliance for emergency/downgraded emergency, non-emergency, and EMS District transports.

### Emergency and Downgraded Emergency (Countywide Transports)

For each month within the 24 months, Sunstar did not meet the monthly contractual response time requirement of 91% for emergency and downgraded emergency transports, resulting in a 0% compliance rate for emergency and downgraded emergencies, as illustrated within the graph below.



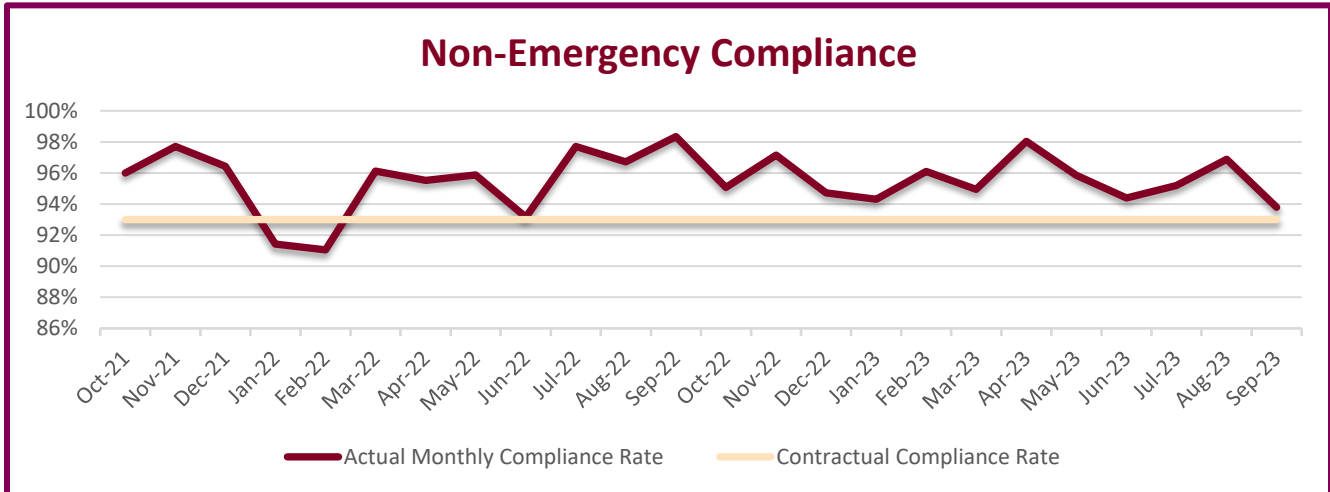
Section 405(b)-ii of the contract between the County and Paramedics Logistics Florida states the following regarding emergency and downgraded emergency response time compliance for Countywide transports:

*“Countywide Response Time to Emergency Requests and Downgraded Emergency Requests combined shall be ten (10) minutes and zero (0) seconds or less, for Emergency Requests, and twenty (20) minutes and zero (0) seconds or*

less, for Downgraded Emergency Requests, ninety-one (91.00%) percent of the time or greater, except as otherwise provided herein.”

Non-Emergency Transports

Within the 24-month period, Sunstar did not meet the contractual response time requirement of 93% for non-emergency transports for two months (January 2022 and February 2022), as illustrated in the graph below.

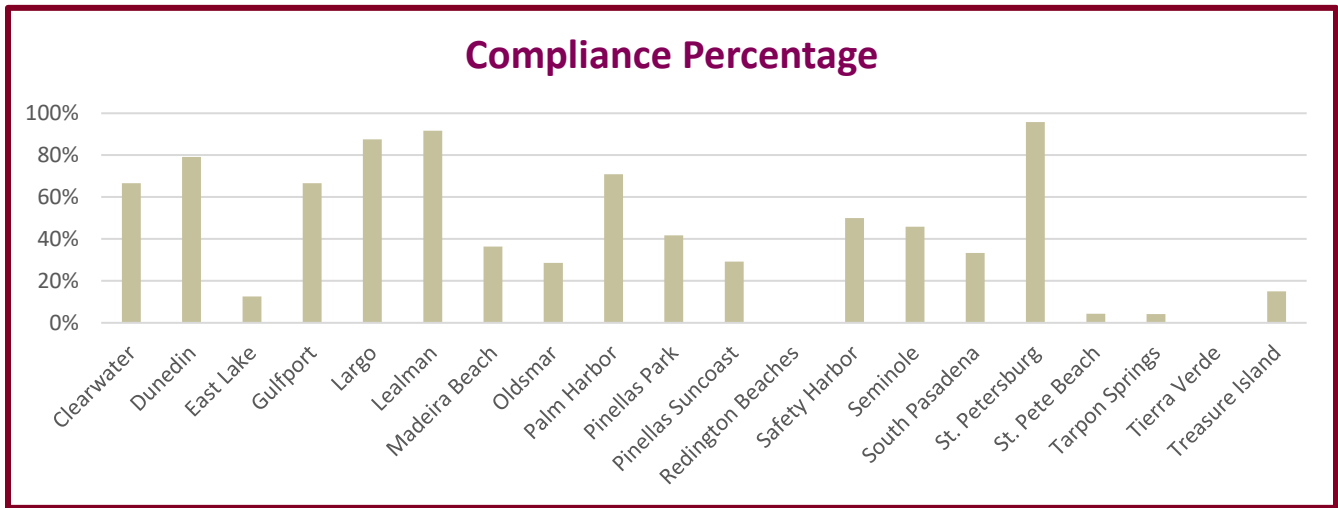


Section 405(c) of the contract between the County and Paramedics Logistics Florida states the following regarding non-emergency response time compliance for Countywide transports:

*“Response Time to not less than ninety-three (93.00%) percent of scheduled Non-Emergency Request, made less than twenty-four (24) hours in advance of the requested pickup time, and unscheduled Non-Emergency Requests shall be sixty (60) minutes and zero (0) seconds or less Countywide. Contractor may negotiate a mutually agreed scheduled pick up time either when a scheduled Non-Emergency Request is received or renegotiated once with a callback.”*

EMS District Emergency and Downgraded Emergency

During the 24-month period, Sunstar did not consistently meet the monthly contractual response time requirement of 90% for each of the 20 EMS Districts with regard to emergency and downgraded emergency transports. On average, Sunstar met the contractual response time compliance rate for only 42.96% of transports for all EMS Districts. The following graph illustrates the overall compliance percentage for each district within the testing period (calculated as the number of months during the 24-month period each district was compliant with the contractual response time 90% of the time or greater) .



Section 405(b)-iii of the contract between the County and Paramedics Logistics Florida states the following regarding emergency and downgraded emergency response time compliance for EMS District transports:

*“Response Time to Emergency Requests and Downgraded Emergency Requests within each EMS District combined shall be within twelve (12) minutes and zero (0) seconds or less, for Emergency Requests, and twenty (20) minutes and zero (0) seconds or less, for Downgraded Emergency Requests, ninety (90.00%) percent of the time or greater. In EMS Districts experiencing low call volumes, Response Time evaluation shall be based upon analysis of not less than one hundred (100) consecutive Emergency Requests or Downgraded Emergency Requests.”*

According to data from the Computer Aided Dispatch system, Sunstar medical professionals documented two late reason explanations:

- Multiple calls in the district
- Volume exceeds resources

The above reasons directly resulted from reduced staffing levels and the number of emergency vehicles. These explanations contributed to over 80% of the total count of late reasons that negatively impacted the timeliness of transport responses for fiscal years 2021 through 2023. The following table displays the usage percentage for the two late reasons against the total count of late calls.

<b>Late Response Percentage</b>			
	<b>FY 2021</b>	<b>FY 2022</b>	<b>FY 2023</b>
<b>Multiple Calls In District (Count)</b>	20,039	21,251	17,296
<b>Volume Exceeds Resources (Count)</b>	2,207	3,572	3,489
<b>Total Count of All Late Calls</b>	25,201	27,954	24,821
<b>% Multiple Calls In District (MCD)</b>	79.52%	76.02%	69.68%
<b>% Volume Exceeds Resources (VER)</b>	8.76%	12.78%	14.06%
<b>Total Percentage (MCD + VER)</b>	<b>88.28%</b>	<b>88.80%</b>	<b>83.74%</b>

The lack of transport response timeliness contributes to the following adverse outcomes, which could significantly impact the County:

- County residents and visitors may receive decreased quality and overall medical care.
- Reputational distrust by County residents may impact Sunstar's overall image.
- Sunstar will not meet contractual obligations and requirements.
- Additional financial commitments between the County and Sunstar may increase if an individual's health issues worsen due to untimely medical attention.

***We Recommend Management:***

- A. For the current and future ambulance contracts, coordinate with Sunstar to analyze and determine the following to increase emergency, non-emergency, and EMS District transport response times:
  - The appropriate number of emergency vehicles required to successfully achieve contractual response time compliance.
  - Efficient emergency vehicle staging locations to ensure County residents are transported safely and in a timely manner.
  - The number of full-time medical employees required to staff emergency vehicles and optimize performance efficiently.
  
- B. For the current and future ambulance contracts, coordinate with Sunstar and County Traffic Management to obtain the Emergency Vehicle Preemption traffic light system to utilize within Sunstar emergency vehicles for critical situations. This could decrease response times for life-threatening transports and assist Sunstar in completing its contractual obligations.

***Management Response:***

- A. **Management Concurs.** County Purchasing and Safety and Emergency Services are currently bidding for an updated set of service requirements regarding number of ambulances, full time employees, response times and most importantly unit hours for expected levels of services.



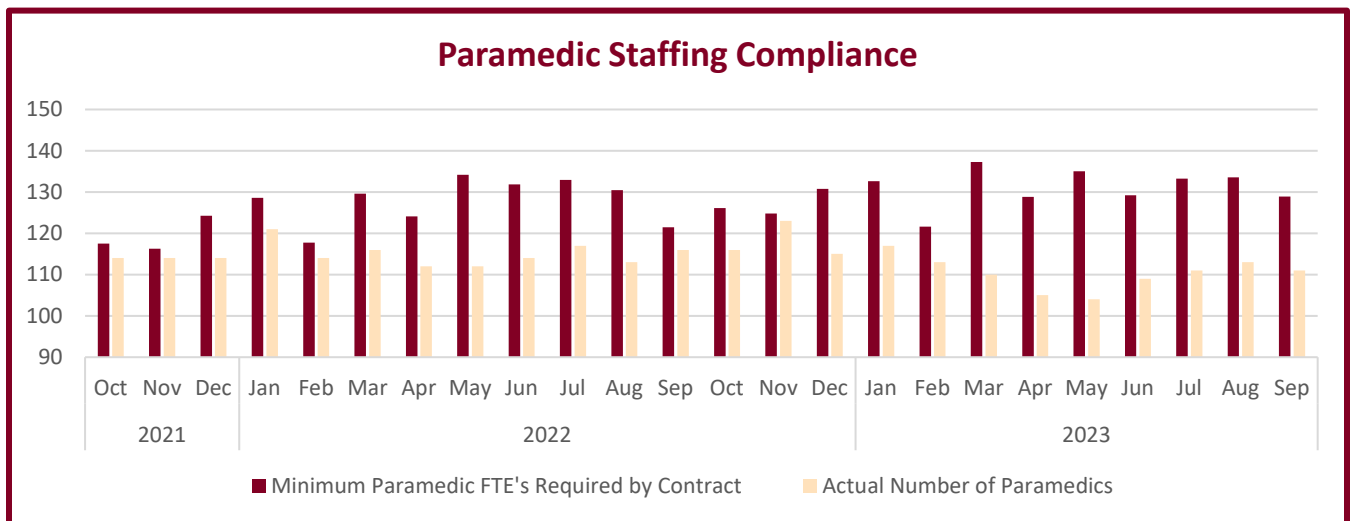
For the duration of the existing contract, the EMS Director is meeting bi-weekly to review the staffing plan for the coming two weeks, the staffing plan for the previous two weeks and system compliance the plan produces. This is in addition to the monthly review that has been historically conducted.

- B. **Management Concurs.** The EMS Division is implementing various technology solutions that are designed to improve response times including a new traffic pre-emption system that includes ambulances as well as additional deployment modifications designed to improve responses.

## 2. Paramedic Staffing Compliance

From October 1, 2021, through September 30, 2023, Sunstar did not meet the monthly minimum full-time Paramedic staffing required by the contract, as illustrated in the graph below.

In addition, on average, Sunstar's Paramedic full-time employee levels were 11.10% below the minimum number of staff members contractually required for the testing period.



Section 410(f) of the contract between the County and Paramedics Logistics Florida states the following regarding minimum Paramedic staffing contractually required:

*“Contractor shall offer to its employees a compensation and benefits package designed to attract and retain highly qualified Personnel. Contractor shall ensure not less than eighty percent (80%) of Paramedics are employed in a full-time capacity. Further, Contractor shall ensure not less than eighty (80%) of EMTs are employed in a full-time capacity. Contractor shall report its compliance to this*

*provision on a monthly basis using the method described in Appendix F attached hereto.”*

In addition, according to Appendix F, the contract uses the following calculation to obtain the monthly minimum of full-time Paramedics required to be staffed by Sunstar:

*“Paramedics - Monthly Transports divided by 1,000 and multiplied by 10 (10 FTEs needed per 1,000 Transports) equals the number of Full Time Equivalent (FTEs) needed. Example: (8,000 Transports/1,000 x 10) = 80 FTEs.”*

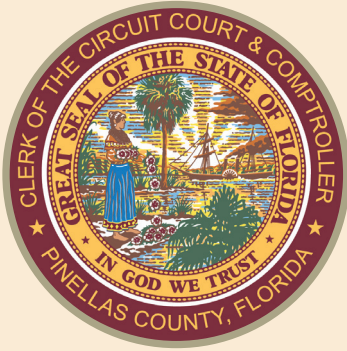
Due to COVID-19 and financial matters pertaining to employee compensation, medical staffing issues have become problematic across the United States and in Pinellas County. These staffing issues can potentially reduce the quality and promptness of medical services to County residents and visitors, which may cause a financial burden for the County and impact its overall reputation.

***We Recommend Management:***

For the current and future ambulance contracts, inquire whether Sunstar is periodically monitoring Paramedic workforce levels and competitive pay rates to ensure they are actively attracting experienced and knowledgeable Paramedics and retaining talented employees.

***Management Response:***

**Management Concur.** County Purchasing and Safety and Emergency Services are currently bidding for an updated set of service requirements regarding number of ambulances, full time employees, response times and most importantly unit hours for expected levels of services. The requirements include a focus upon wages and incentives for the workforce. Currently and for the remaining 7 months; this will be monitored bi-weekly.



# DIVISION OF INSPECTOR GENERAL

KEN BURKE, CPA  
CLERK OF THE CIRCUIT COURT  
AND COMPTROLLER  
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