

FYI - below is an email I sent the Mayor and Council yesterday trying to make them take some action. Or at least have them explain why they're not. Here is adding a bit more than what I included in my note to them yesterday ...

The GEMT reimbursements are more inclusive of all things medical transport related. **All** costs are included when calculating the reimbursement per the GEMT reimbursement guidelines. This includes salaries, fringe benefits, administrative and general costs (i.e. supplies, fleet maintenance, etc.) and capital related costs. All of these are used to determine an average cost per medical transport. Once determined, then the total cost for reimbursement is simply this average cost multiplied by the number of "Fee for Service" transports that were provided during any particular year. The federal government then pays 50% for these services (the GEMT reimbursement). Only about 20% of all transports fall into the "Fee for Service" category. What we have been reimbursed by SCF RFA in the past has been only for transports outside of this category. They have withheld from us the GEMT reimbursements they receive from the "Fee for Service" category.

The GEMT program has different and broader allowances than billing an insurance company and hence is an attractive revenue stream for participating agencies. None-the-less, it's still a reimbursement of transport fees that we're entitled to under our contract. Our contract makes no distinctions on what is or what is not included in the fee. The federal government GEMT "fee" allowance just happens to be higher than what is collected from insurance companies.

In addition, when I look up the legal definition of a "fee", I get:

Legally, a **fee** is generally defined as a payment for services rendered or a charge imposed for a specific act. It can refer to compensation for professional services, such as attorney fees, or government-imposed charges, like licensing fees. In property law, "fee" can also denote an inheritable interest in land, such as **fee simple**, which represents absolute ownership ¹ ² .

Definitely, the RFA has received payments for medical transport services via the GEMT program. They try to spin it otherwise or suggest that other cost factors don't apply to the reimbursement. The GEMT reporting is really clear so they can't parse out expenses that they feel don't apply to the reimbursement. I'm sure they will continue to look for loopholes as their liability is rather substantial at this point. We need to continue to demand an answer from the city as to the status of this.

Hope you find this helpful,

Jim

From: James Ogonowski

Sent: Saturday, May 10, 2025 12:00 PM

To: Mike Rosen; Edmonds City Council

Cc: Teresa Wippel; Larry Vogel; Brian Soergel; Jon Bauer; Jenna Peterson

Subject: Ground Emergency Medical Transport (GEMT) Reimbursement

Mr. Mayor, Councilmembers,

This note is a follow-on to one I sent months ago about the RFA withholding money owed to us per our current contract. Last week I received additional information through a public records request pertaining to the Ground Emergency Medical Transport (GEMT) program. This allowed me to update my analysis including more years of traceable cost data. All data was sourced from public information. Following the money suggests that South County Fire RFA may owe the City of Edmonds over \$10 million dollars from GEMT reimbursements they received and did not remit to the city per our contract.

SCF RFA continues to suggest that because the GEMT program is associated with Medicaid, we're not entitled to reimbursement - my research suggests otherwise. SCF is an eligible provider of Medicaid transport services (per RCW 41.05.735) which makes them eligible for the GEMT program. Obviously, we have a contract with an eligible provider and there are no requirements for the city to have any secondary provisions. Our contract specifically states: *"the District shall receive and pursue collection of **all** Transport Fees"* and further states: *"The District shall remit the amount so received to the city"*. It's clear that SCF pursued collection through the filings it has made over the years to the Washington State Health Care Authority who oversees the program for GEMT reimbursements. In their application, they included **all** transport-related costs (including Edmonds) and specifically identified the number of "Fee for Service" medical transports on which the reimbursements are based. Hence, unless they have misrepresented their reimbursement application, and I'm not suggesting that they have, their other argument that it's not a fee-related reimbursement program seems bogus. In multiple locations on the application "fee for service" is identified.

Over the course of nine years, SCF RFA has received over \$42 million dollars of reimbursement through the GEMT program. That's not including the 2025 fiscal year (for the program, the fiscal year is aligned with the state).

What are we doing to collect these funds? I would suggest that before you ask the community for a levy lid lift, you are able to tell us what is being done to recover money already owed the city. And if you're not actively pursuing it, why not? At \$10 million dollars, it negates the need for a levy lid lift this fall and provides time to strengthen your other identified revenue

streams. This money needs to be part of your financial recovery strategy and not an afterthought.

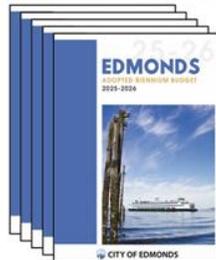
Additional information/clarification available upon request,

Jim Ogonowski

Source Documents



SCF/Edmonds Fire Contract



Edmonds Budgets



SCF Budgets



SCF Annual Reports



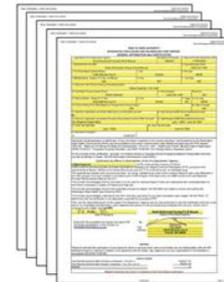
RCW 41.05.735



WA Fire Chiefs GEMT Document

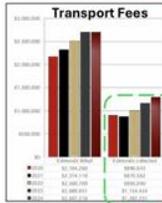


Washington State Health Care Authority



GEMT Cost Reports

Follow the Money



SCF pursued and received collection through the GEMT program but did not remit received amount to the city



Per our contract with the RFA: "the District shall receive and pursue collection of all transport fees"; "The District shall remit the amount so received to the city"

Year	MTS Expense	Medicaid Revenue	Other Revenue	RFA Collected and Distributed		Percent Distributed	Number of MTS Transports				Total Transports	Cost per Transport	Total Cost of Fee for Service GEMT Transports	Less Medicaid Revenue	GEMT Reimbursement	GEMT Reimbursement + Medicaid Revenue	Edmonds Share Percentage	Owed Edmonds
				to Edmonds	to Edmonds		Managed Care	WA/Medicaid	Medicare/Medicaid	Fee for Service								
2016	\$ 37,285,710	\$ 36,814	\$ 2,470,097	\$ 862,300	\$ 862,300	35%	1757	1150	2947	6748	9002	\$ 3,765	\$ 33,816	\$ 893,258	\$ 445,629	\$ 483,443	35%	\$ 166,780
2017	\$ 40,362,157	\$ 14,900	\$ 2,468,266	\$ 781,506	\$ 781,506	32%	1917	1103	102	7057	10179	\$ 3,965	\$ 404,454	\$ 389,554	\$ 184,777	\$ 209,677	32%	\$ 66,388
2018	\$ 37,175,600	\$ 232,882	\$ 2,738,930	\$ 1,013,928	\$ 1,013,928	37%	547	941	1515	7057	10028	\$ 3,707	\$ 5,616,378	\$ 5,383,496	\$ 2,691,749	\$ 2,924,630	37%	\$ 1,092,672
2019	\$ 56,910,233	\$ 408,991	\$ 4,821,141	\$ 973,880	\$ 973,880	20%	0	1957	2972	8964	13493	\$ 4,057	\$ 10,848,078	\$ 10,439,087	\$ 5,219,544	\$ 6,028,535	20%	\$ 1,136,975
2020	\$ 58,731,237	\$ 428,422	\$ 3,753,547	\$ 896,643	\$ 896,643	24%	0	1913	2736	1846	2056	\$ 4,292	\$ 11,644,950	\$ 11,218,528	\$ 5,608,264	\$ 6,036,886	24%	\$ 1,442,037
2021	\$ 65,002,505	\$ 441,415	\$ 4,138,088	\$ 870,562	\$ 870,562	21%	0	1846	2752	1846	2056	\$ 4,292	\$ 13,038,403	\$ 12,566,068	\$ 6,298,484	\$ 6,739,909	21%	\$ 1,417,928
2022	\$ 59,891,963	\$ 483,034	\$ 4,173,638	\$ 995,040	\$ 995,040	24%	0	1846	2752	1846	2056	\$ 4,292	\$ 12,406,397	\$ 11,923,363	\$ 5,961,681	\$ 6,444,715	24%	\$ 1,536,489
2023	\$ 85,339,415	\$ 514,071	\$ 5,416,380	\$ 1,154,454	\$ 1,154,454	21%	0	1846	2752	1846	2056	\$ 4,292	\$ 18,089,783	\$ 17,575,106	\$ 8,787,553	\$ 9,302,230	21%	\$ 1,962,689
2024	\$ 90,598,415	\$ 533,410	\$ 5,573,401	\$ 1,282,251	\$ 1,282,251	23%	0	1846	2752	1846	2056	\$ 4,292	\$ 17,456,954	\$ 16,923,544	\$ 8,461,772	\$ 8,965,182	23%	\$ 2,069,487
Totals	\$ 531,297,235	\$ 3,094,545	\$ 35,553,488	\$ 8,830,624	\$ 8,830,624	25%	4221	10891	19119	77202	116233	\$ 4,571	\$ 87,392,323	\$ 84,297,776	\$ 42,148,869	\$ 45,243,434	26%	\$ 10,903,445

Spreadsheet developed using source document data

Since 2016, South County Fire may now owe Edmonds over \$10 million dollars