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March 23, 2015

Valerie Phillips, M.D.
Advocate Good Samaritan Hospital
3815 Highland Avenue
Downers Grove, IL 60515

Subject: Mobile Integrated Healthcare Program Plan

Dear Dr. Phillips:

The Illinois Department of Public Health, Division of Emergency Medical Systems (EMS) and Highway Safety (Department) is in receipt of the final draft of the proposed Mobile Integrated Healthcare (MIH) Program Plan. The Department has concluded its final review and appreciates the finalized changes to the program based upon the Department's request.

The Department recognizes the MIH committee has made a tremendous effort to keep this program within the current scope of practice of EMS providers who function under the medical direction of the EMS System Medical Director. Additionally, based on the program, the Department understands that no EMS Provider will receive nor act upon any orders, whether verbal or written, from any of the collaborating physician(s). All medical orders to EMS Providers must exclusively originate from the EMS System, under the authority of the EMS Medical Director. The collaborating physician(s) may give instructions directly to the patient or the patient's authorized care provider, but not to the EMS Provider. EMS Providers are not authorized to take medical orders from anyone other than the EMS Medical Director or his/her designee, as described within the EMS Act and the Local System Program Plan.

This program focuses primarily on a patient visit where the intent is to "not transport" the patient to the hospital, and will be considered non-emergency in nature. There may be some circumstances encountered by the EMS provider which may not be covered under the immunity of the Emergency Medical Services (EMS) Systems Act (210 ILCS 50). Therefore, the Department recommends that before any EMS System Medical Director implements this program, they should carefully review the scope of practice of the EMS Act with their respective hospital's legal counsel for potential liability issues and its insurance carrier with respect to insurance coverage. Careful review needs to assure that any risks of liability are understood and appropriately addressed by the EMS System and its Providers. The Department takes no official position on this very important issue.

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The Department recommends any EMS System who wishes to implement this program complete an application for an amendment to the System Program Plan and submit it to the Department for review and approval. Once approved, the Department will provide a copy of their approved MIH Program Plan with a cover letter to each of the state-approved EMS Systems.

The Department would like to commend the committee on their hard work and patience in authoring this program. The Department looks forward to working with each EMS System that seeks to expand their EMS pre-hospital activities to include the components of the MIH program into their EMS System program plans. The Department requests frequent updates with respect to operations, successes and challenges.

If you have any questions or concerns, please do not hesitate to contact our office at 217.785.2080. Thank you for your ongoing commitment to the provision of EMS services to your community and surrounding areas.

Sincerely,



Jack R. Fleeharty, RN, EMT-P
Chief, Division of EMS and Highway Safety
Illinois Department of Public Health

JRF:tmh

cc: Jonathan Gunn, Assistant General Counsel, IDPH
George Madland, Chair, MIH Committee
State Regional EMS Coordinators