



State of New Jersey
DEPARTMENT OF HEALTH
OFFICE OF EMERGENCY MEDICAL SERVICES
PO BOX 360
TRENTON, N.J. 08625-0360

CHRIS CHRISTIE
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www.nj.gov/health

MARY E. O'DOWD, M.P.H.
Commissioner

July 25, 2013

Mr. Yousif Abdelrazig
Good Care Invalid Coach
2 Lakeview Ave. Suite 311D
Piscataway, NJ 08854

**Re: Notice of Summary Suspension of Provider License:
Mobility Assistance Vehicle
Investigation Control # 2013-296**

Dear Mr. Abdelrazig:

The New Jersey Department of Health (the Department) is vested with the responsibility of carrying out the provisions of *N.J.S.A. 26:2H-1 et seq.*, *Health Care Facilities Planning Act*, which was enacted, in part, to ensure that hospital and related health care services rendered in New Jersey are of the highest quality. As defined at *N.J.S.A. 26:2H-2b*, health care services include pre-hospital basic life support ambulance services. In addition, in accordance with *N.J.S.A. 30:4D-1 et seq.*, *New Jersey Medical Assistance and Health Services Act*, specifically *N.J.S.A. 30:4D-6.4* and *6.6*, the Department is responsible for the development of minimum licensure requirements concerning the equipment, supplies and vehicles of providers of mobility assistance vehicle services. The applicable rules are set forth in their entirety at *N.J.A.C. 8:40*.

On June 28, 2013, the Office of Emergency Medical Services (OEMS) received a report from John F. Kennedy Medical Center stating that one of the Good Care Invalid Coach vehicles was involved in a patient injury. The report stated that a resident fell from the lift of the van when the lift was elevated in the air and the resident flipped over backwards. According to OEMS records, there is no record of this incident being reported.

On July 10, 2013, OEMS conducted unannounced vehicle inspections at John F. Kennedy Medical Center in Edison New, Jersey. During this time, OEMS staff inspected two of the Good Care Invalid Coach vehicles and placed them both on Department Initiated Out-of-Service (DIOOS) status. At that time, your staff indicated that you had two other Good Care Invalid Coach vehicles in-service providing medical transport, but OEMS' licensing software, which is updated by you, only shows three Good Care Invalid Coach vehicles in total.

As OEMS staff were inspecting Good Care Invalid Coach vehicle #08, a woman with an infant approached your driver and inquired as to when she was going to be transported since she was waiting three and one-half hours. OEMS staff contacted your company and spoke with a manager identified as "Amro." He stated he would have another Good Care Invalid Coach vehicle there in approximately 90 minutes since two other vehicles were occupied in North Jersey. When asked how he planned to secure the infant and the carrier, Amro stated that it was a short ride to Plainfield and the mother could hold the carrier on the floor of the vehicle.

OEMS staff explained this was not acceptable pursuant to the applicable administrative rules and was completely unsafe. At this time, the driver stated she was going to pay for a cab in order to facilitate the transport.

As a result of these incidents, on July 12, 2013 the OEMS conducted an unannounced inspection of your facility. Investigators arrived at the address you have on file with OEMS and discovered that it was vacant. Once OEMS identified the appropriate location, investigators were met by a representative of your agency and an audit was performed. The following deficiencies were identified:

1. There were no patient care records for 2010-2013 for any patient transported by the licensed entity, Good Care Invalid Coach, which is in violation of *N.J.A.C. 8:40-3.6*.
2. Your staff indicated that there were three to four drivers in your company and family members who help out. There was no staff roster to identify your employees. Your staff presented OEMS with over twenty personnel files. Most were missing current copies of certification, which is in violation of *N.J.A.C. 8:40-3.8*.
3. Upon entering your office, OEMS staff found patient records and trip logs from LogistiCare lying on the floor and thrown around in piles throughout the office. Many of the files were patient care records from 2008 and 2009. None of the records were secured to ensure patient information was safely stored as required by the Health Insurance Portability and Accountability Act of 1996 (HIPAA; Pub.L. 104-191, 110 Stat. 1936, enacted August 21, 1996). This is in violation of *N.J.A.C. 8:40-3.9*
4. Your agency has no records of any patient injuries and/or accidents, which is in violation of *N.J.A.C. 8:40-3.7*.
5. No Standard Operating Procedure Manual could be located, which is in violation of *N.J.A.C. 8:40-3.5*.
6. Good Care Invalid Coach Vehicle #06 was found in the parking lot unsecured. Your staff stated that all vehicles are left unlocked and unsecured since a management person is not present to give them keys, since much of the business is conducted over the phone from a residential location. You are reminded that keeping vehicles unsecured is in violation of *United States Public Law 107-296 Sec. 865 Homeland Security Act* because it creates a foreseeable risk that the vehicle may be utilized as an instrumentality of mass destruction, injury and/or other loss to citizens and/or institutions in the United States.
7. Your staff stated that you wanted to license another MAV. Your staff identified it as vehicle #12 and stated you have been utilizing it for months to do transports. Investigators subsequently tried to locate the vehicle that your representative stated was receiving maintenance in Plainfield, NJ; but, they were unable to locate any Good Care Invalid Coach at this location.

N.J.A.C. 8:40-7.2(b) states, "The Commissioner or his or her designee may summarily suspend the license of any provider when, in his or her opinion, the continued licensure of that provider poses an immediate or serious threat to the public health, safety or welfare."

N.J.A.C. 8:40-7.2(c) states, "Violation of any portion of this chapter by a provider may be cause for action against the provider, including but not limited to, a formal written warning, monetary penalty, suspension, revocation, placing the provider's vehicle in "Department-Initiated-Out-of-Service" (DIOOS) status, placing of conditions for continued operation by the provider, refusal to issue or renew a license, the reassignment of medical command and/or any combination thereof."

Be advised, the current OEMS investigation revealed a consistent failure to comply with state regulations and evidence of individually identifiable medical information being compromised. After carefully considering all the available information, the Department finds that Good Care Invalid Coach's continued licensure as an MAV service constitutes an immediate and serious threat to the health, safety and welfare of the public. **Therefore, Good Care Invalid Coach's license as a Mobility Assistance Vehicle Service is immediately suspended and shall remain suspended indefinitely.** OEMS shall continue to investigate this matter during the suspension period. At this time the Department reserves the right to impose monetary penalties or any other authorized enforcement action, including revocation of the provider license.

Please be advised that you may not, under any circumstances, operate as a MAV service provider anywhere within the State of New Jersey during this period of suspension. You may request a hearing before an administrative law judge at the Office of Administrative Law to contest this matter. Your request for a hearing must be submitted within 30 days from the date of this Notice. Please include the control number 2013-296 on your correspondence and forward your request to:

New Jersey Department of Health
Office of Legal & Regulatory Compliance
P.O. Box 360, Room 805
Trenton, NJ 08625-0360
Attn: Ms. Tami Roach

If you have any questions concerning this matter, please do not hesitate to contact Dr. Jo-Bea Sciarrotta, OEMS Compliance Officer, at (609) 633-7777.

Sincerely,



Karen Halupke, RN, M.Ed.
Director, Emergency Medical Services

c: Christopher Rinn, Assistant Commissioner
Tami Roach, OLRC
Christopher Ryan, OEMS
James Sweeney, OEMS
LogisticCare

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