



CONTRA COSTA  
**HEALTH**

777 Arnold Drive, Suite 110 | Martinez, CA 94553 | Phone: (925) 608-5454 | Fax: (925) 228-2492  
cchealth.org

October 18, 2023

**VIA EMAIL & U.S. REGISTERED MAIL**

Anthony Blakeley  
EMT Program Director  
Los Medanos Community College  
2700 East Leland Road  
Pittsburg, CA 94565

**RE: NOTICE OF EMT PROGRAM NON-COMPLIANCE and DEMAND FOR  
CORRECTIVE ACTION PLAN**

Dear Mr. Blakeley:

This letter serves to notify Los Medanos College (“College”) that its emergency medical technician program (“Program”) is non-compliant with Title 22, Chapter 2, of the California Code of Regulations. This letter also serves as a formal demand that the Program submit to the Contra Costa County Emergency Medical Services Agency (“CCCEMSA”) within 15 days of the date of this letter, evidence of the Program’s compliance with the applicable California Code of Regulations, or a corrective action plan that includes a plan for correcting its non-compliance, and for maintaining compliance, as required by 22 CCR § 100162, subdivision (b)(2))

**A. EMT PROGRAM NON-COMPLIANCE**

The Program is not compliant with the regulations for the following reasons:

**1. Program Director Requirement**

The Program must always have a Program Director to maintain continuous program approval. (22 CCR § 100070, subd. (b).) On August 7, 2023, you notified me via email that you were the new Program Director. However, no formal application has been received by CCCEMSA through its online license management system to change you to the Program’s official Program Director.

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On August 8, 2023, you informed me that Mr. Cutino's last day with the College was July 31, 2023. You informed me on August 10 that you had not yet officially "started" with the College, and thus were unable to access to Mr. Cutino's office where the Program's records and documents were stored. Consequently, there was a delay in providing records in response to CCCEMSA's audit of the Program. Additionally, and as discussed more fully below, you informed CCCEMSA that you have been unable to locate certain records to evidence the Program's compliance with the regulations.

## **2. Clinical Coordinator**

The Program must always have a Clinical Coordinator to maintain continuous program approval. (22 CCR § 100070, subd. (b).) The Clinical Coordinator shall be either a Physician, Registered Nurse, Physician Assistant, or a Paramedic currently licensed in California, and who shall have two (2) years of academic or clinical experience in emergency medicine or prehospital care in the last five (5) years.

Currently, Paul Cutino is designated as the Program's Clinical Coordinator. However, CCCEMSA understands that Gretchen Medel was functioning as the Program's Clinical Coordinator, and in that capacity, was solely responsible for the organization and management of the students' clinical experience. Ms. Medal holds only an EMT certificate. The Program must always have a Clinical Coordinator that meets the minimum educational and experience requirements established by the regulations.

Additionally, the Program was unable to provide evidence that the Clinical Coordinator was overseeing the quality of medical content of the Program, or that the Clinical Coordinator was approving the qualification of the principal instructor(s) and teaching assistant(s) as required by 22 CCR § 100070, subdivision (d).

## **3. Principal Instructor(s)**

The Program must always have an approved principal instructor to maintain continuous program approval. (22 CCR § 100070, subd. (d)(2)(e).) Any change in the Principal Instructor(s) must be reported to the Agency within 30 days of the change. (22 CCR § 100071, subd. (c).)

Mr. Cutino is the only approved principal instructor on file for the Program. In August 2023, Kevin Rose acted as a principal instructor. On October 10, 2023, after notification that Mr. Rose was not an approved principal instructor or teaching assistant, you applied on behalf of the Program to add Mr. Rose and Ms. Medel as principal instructors.

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#### **4. Teaching Assistant(s)**

Teaching assistants must be approved and supervised by the Program Director in coordination with the Clinical Director. Approved teaching assistants must be on file with the Agency. Additionally, the Program must maintain evidence of Program Director and Clinical Coordinator approval of its teaching assistants.

The only approved teaching assistants on file are:

- Kristen Cunningham
- Ronald Davis
- Devon Del Dosso
- Jesse Gomez
- Paul Cutino
- Gretchen Medel
- Heather Tapia
- Mark Trilevsky
- William Tucker
- Dillian Wagner
- Christopher Jones

The Program was or is employing teaching assistants other than the individuals listed above to assist with both didactic and psychomotor instruction. Additionally, you informed me on August 29, 2023, that you did not know many of these individuals and/or they were not affiliated with the Program. The Program must maintain an accurate list on file of individuals whom it employs as teaching assistants.

Moreover, the Program was unable to provide to CCCEMSA evidence that its teaching assistants met the minimum “experience” requirements or that they had been approved by the Program Director and its Clinical Coordinator.

#### **5. Failure to Provide Evidence of Course Final Exam**

Before being issued an EMT course completion certificate, each student must successfully complete periodic and final written and skills competency examinations that include all skills covered by course content listed in 22 CCR §§ 100075, 100076.

On August 7, 2023, CCCEMSA initiated an audit of the Program and requested that the Program produce evidence that each student who was issued a course completion certificate was administered and passed a final course examination. On August 9, 2023, you emailed me and stated, “I have since spoken with Paul [Cutino] and he assures me that there was a final exam provided to all students. There was also a psychomotor exam

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given to all students. This information will be provided in the documentation that will be sent out.” Subsequently, you informed CCCEMSA that the Program was unable to provide CCCEMSA with any evidence that any student who received a course completion certificate from 2019 through September 2023 had taken a final course exam.

Regarding skills exams, the Program provided CCCEMSA with original NREMT final skills exams for its Program, however, the Program was unable to produce evidence that any student took intermittent skills exams as required by 22 CCR § 100075. Notably, some of the NREMT final skills exams provided to CCCEMSA were incomplete and omitted critical information (e.g., examiner and/or student name.)

## **6. Unauthorized Change in Final Examination**

The regulations require that the Program submit simultaneously to CCCEMSA the course final examination for review and approval with its application for EMT training program approval. (22 CCR § 100066, subd. (b)(5).)

Notwithstanding that the Program could not provide evidence that a course final examination was administered for its EMT courses from years 2019 through 2023, the Program informed CCCEMSA on September 29, 2023, that it was no longer using the written final examination that was approved by CCCEMSA in 2019; rather, the Program had transitioned to Platinum Education for its intermittent and final examinations.

CCCEMSA informed the Program that it did not have approval to change the content or modality of its final examination during an in-person meeting with you on September 29, 2023. The same day of this notification to the Program, the Program submitted an email request to CCCEMSA to use Platinum Education’s final examination for the Program’s intermittent exams and course final. The Program’s request to utilize Platinum Education’s exams is under review by CCCEMSA.

## **7. Failure to Administer Intermittent Skills Examinations**

As discussed above, the Program must administer periodic and final skills competency examinations that include all skills covered by course content listed in 22 CCR §§ 100075, 100076.

Although the Program submitted to CCCEMSA NREMT skills examinations for its students for the Program’s courses from 2019 through 2023, the Program did not produce any evidence of intermittent skills examinations that included all skills covered by course content.

## **8. Unauthorized Changes to Program**

The Program was required to submit the information required by 22 CCR § 100066 to obtain Program approval. The Program must apply to CCCEMSA to amend or change any information in its initial program application, and the application must be approved prior to implementation of any changes. (22 CCR § 100066, subd. (b)(10).)

## **9. Failure to Provide Evidence of Student Attendance for Required Course Hours**

Students must complete a minimum of 170 hours of instruction to complete the Program, in addition to completing the mandatory intermittent and final skills and didactic examination. (22 CCR § 100074 subd. (a).)

CCCEMSA requested that the Program provide evidence of classroom attendance for each of its students for each class from 2019 through 2023. The Program informed CCCEMSA on October 14, 2023, that it had no attendance records to evidence that students completed the minimum 170-hours of classroom instruction.

## **10. Failure to Provide Course Completion Rosters**

The Program is to submit to CCCEMSA the name and address of each person receiving a course completion record and the date of course completion within 15 days of course completion. (22 CCR § 100070, subd. (d).)

CCCEMSA had not received course completion rosters for the program since 2020. In July 2023, CCCEMSA requested former Program Director Paul Cutino provide the course completion rosters for any courses held from 2020 through current. On July 7, 2023, Mr. Cutino provided CCCEMSA with course rosters for Spring 2021 through Spring 2023. The course rosters did not include all required information (*i.e.*, the address for each of the students who received a course completion certificate.)

## **11. EMT Refresher Course Curriculum**

CCCEMSA requested that the Program provide the curriculum for its EMT refresher course. The Program informed CCCEMSA that the 24-hour EMT refresher course used the same curriculum as the 170-hour basic EMT course. CCCEMSA requested that the Program provide an explanation describing how the 24-hour EMT refresher course was taught with 170 hours of curriculum from the basic EMT course. The Program explained that the prior Program Director used excerpts from the 170 hours EMT curriculum for the EMT refresher. The Program was unable to provide documentation such as PowerPoints, lecture notes, or other materials that specified which topics were taught and for how many hours from basic EMT program's 170-hour course.

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## **12. Clinical Experience for EMT**

Supervision for the EMT student clinical experience shall be provided by an individual who meets the qualifications of a principal instructor or teaching assistant. (22 CCR § 100068.)

CCCEMSA requested that the Program provide evidence that each individual that provided either ambulance or hospital clinical supervision (*i.e.*, the preceptor(s)) was/were qualified as either a principal instructor or teaching assistant.) The Program was unable to provide CCCEMSA evidence that the individuals who supervised ambulance or hospital clinical assignments were properly credentialed. Moreover, the Program was also unable to provide evidence that it had evaluated the supervised EMT students' clinical experience.

The Program has not provided CCCEMSA with copies of its current written agreements with the operational ambulance providers (Bay Medic Ambulance [agreement on file expired 05/2022], Royal Ambulance [agreement on file expired 10/2022], ProTransport-1 [agreement on file expired 12/2022]), general acute care hospitals, or rescue vehicle providers for the clinical portion of the EMT course that the Program is required to maintain for continuous program approval.

## **13. Improper Issuance of Course Completion Records**

Course completion records may only be issued to students upon successful completion of all program requirements. (22 CCR § 100077, subd. (a).) Each component of an approved program shall include periodic and final competency-based examinations to test the knowledge and skills specified in this Chapter. Satisfactory performance in these written and skills examinations shall be demonstrated for successful completion of the course.

The Program issued course completion records for students from 2019 through 2023 for which the Program is unable to demonstrate that that student participated in, or satisfactorily performed, intermittent skills examinations. As discussed above, the Program has no record of any student competing a final written examination for the course. (22 CCR § 100076.)

Additionally, the Program has not demonstrated that its course completion records issued between 2019 and 2023 are tamper resistant. (22 CCR § 100070, subd. (a).) The Program affixed serial numbers to its course completion records, however, it did not maintain any master record to track or cross-reference the serial numbers with the student to whom the course completion record was issued.

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## **B. Demand for Compliance Plan**

For these reasons set forth above, CCCEMSA has deemed the Program non-compliant with the regulations. Within fifteen (15) days from receipt of this noncompliance notification, the Program shall submit in writing, by certified mail, to CCCEMSA:

1. Evidence of compliance with the provisions of the applicable regulations where the Program was deemed to be non-compliant, and,
2. A plan to maintain compliance with the applicable regulations, within sixty (60) days from the day of receipt of this notification of noncompliance, where the Program was non-complaint but has since come into compliance.

Within fifteen (15) days from receipt of your response, or within thirty (30) days from the mailing date of the noncompliance notification, if no response is received, CCCEMSA will issue a decision letter by certified mail to the California Emergency Medical Services Authority and to you. The letter will identify CCCEMSA's decision to take one or more of the following actions:

1. Accept the evidence of compliance provided;
2. Accept the plan for meeting compliance provided;
3. Place the training program on probation; or
4. Suspend or revoke the training program's approval.

Failure to establish evidence of compliance with the regulations, or bring the Program into compliance with the regulations, may result in denial, probation, suspension, or revocation of the Program as authorized by 22 CCR § 100072, subdivision (a).


If you have any questions concerning the content of this letter, you may submit your inquiry by email to [aaron.doyle@cchealth.org](mailto:aaron.doyle@cchealth.org).

Sincerely,

CONTRA COSTA COUNTY EMS AGENCY



AARON DOYLE, NRP  
Prehospital Care Coordinator



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ec: Dennis Franco, Dean, Workforce Development, Los Medanos College  
A'kilah Moore, Interim Vice President of Instruction, Los Medanos College  
Marshall Bennett, Director, CCCEMSA  
Brandon Rowley, EMS Prehospital Care Coordinator, CCCEMSA  
Christy Hollis, EMS Prehospital Care Coordinator, CCCEMSA  
Kim Lew, Division Chief, California Emergency Medical Services Authority  
Joshua J. Tilton, Sr. Stakeholder Program Manager, National Registry of EMTs