

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

CITY OF COLUMBUS, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States of
America, et al.,

Defendants.

No. 18-cv-2364-DKC

DECLARATION OF CHIEF JAMES U. MATZ

I, James Matz, declare under penalty of perjury as prescribed in 28 U.S.C. § 1746:

1. The facts contained in this declaration are known personally to me and, if called as a witness, I could and would testify competently thereto under oath. I submit this sworn declaration in support of Plaintiffs' motion for summary judgment.

2. I am a Deputy Chief of Emergency Medical Services (EMS) for the Baltimore City Fire Department (BCFD). I entered my current position in April of 2020.

3. I have worked for the Baltimore City Fire Department in various positions since 1996. Prior to becoming a Deputy Chief of Emergency Medical Services, I was an EMS Operations Field Chief for ten years.

4. BCFD-EMS responds to emergency (911) calls and transports patients to appropriate medical care using a fleet of 36 emergency medical vehicles (20 advanced life support units and 16 basic life support units). We serve a geographic area of 92 square miles with a daytime population exceeding 1,000,000 and a residential population of more than 620,000.

5. EMS provides emergency transport services to all individuals regardless of their ability to pay and attempts to recoup its costs by seeking reimbursement from a patient's Medicare, Medicaid, or commercial health insurance coverage.

- a. In FY2017, EMS received 154,621 calls for service and transported 100,894 total patients. Of those transported, 73,972 were covered by Medicaid or Medicare, 6,188 were covered through commercial coverage, and 16,913 identified as uninsured.
- b. In FY2018, EMS received 153,232 calls for service and transported 100,018 total patients. Of those transported, 74,770 were covered by Medicaid or Medicare, 5,726 were covered through commercial coverage, and 15,697 identified as uninsured.
- c. In FY2019, EMS received 157,188 calls for service and transported 100,043 total patients. Of those transported, 72,767 were covered by Medicaid or Medicare, 4,997 were covered through commercial coverage, and 15,833 identified as uninsured.

6. If a patient lacks insurance, EMS will seek reimbursement from the patient personally, making several attempts to collect on the debt. However, these attempts are rarely successful. While EMS was able to recoup about 90.5% of costs from patients with insurance coverage, it only recovered 3.8% of costs from uninsured patients.

7. Thus, more uninsured and underinsured individuals means more ambulance calls for which Baltimore does not receive reimbursement and thus must make up for the shortfall in its budget.

8. Baltimore City has one of the busiest EMS departments per capita in the United States. In addition, Maryland's emergency department wait times currently exceed national rates, with EMS transport units often waiting hours to offload patients.¹ With this demand, the Baltimore EMS system is often taxed beyond its capabilities.

9. To help reduce strain on our overburdened emergency systems, EMS partners with the University of Maryland on two initiatives to reduce preventable or unnecessary ambulance trips. The Transitional Health Support (THS) program provides community-based in-home services to high-acuity patients discharged to their homes in an effort to improve health at a lower cost for medically and socially challenged patients. The Minor Definitive Care Now (MDCN) program provides rapid response care to "low acuity" patients (those who need treatment but not in an emergency room setting).

10. An increase in the uninsured rate will only increase the avoidable use of acute health services that these programs are designed to address, causing further strain on a system which is already overstretched.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: August 11, 2020

Baltimore, Maryland

James U. Matz

James U. Matz
Deputy Chief EMS

¹ See generally *Hospital Compare*, Medicare.gov, <https://www.medicare.gov/hospitalcompare/search.html> (last visited August 11, 2020).