

# City of Redmond



## Agenda

Tuesday, October 15, 2024

4:30 PM

City Hall: 15670 NE 85th St; Remote: Comcast Ch. 21/321, Ziplly Ch. 34,  
Facebook (@CityofRedmond), Redmond.gov/rctlive, or 510-335-7371

## Committee of the Whole - Public Safety and Human Services

### Committee Members

*Osman Salahuddin, Presiding Officer*

*Jeralee Anderson*

*Steve Fields*

*Jessica Forsythe*

*Vanessa Kritzer*

*Angie Nuevacamina*

*Melissa Stuart*

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## AGENDA

### ROLL CALL

1. Fire Department - EMS Transport Fee Program [CM 24-491](#)

[Attachment A: Presentation](#)

[Attachment B: Ambulance Services Fee Study - NBS - September 23 2024](#)

[Attachment C: Ordinance for EMS Transport Fee](#)

[Attachment D: Transport Billing Policy](#)

[Attachment E: Billing Policy Flow Chart](#)

[Attachment F: Transport Financial Assistance Policy 2024](#)

*Department: Fire, 15 minutes*

*Requested Action: Consent, November 19th*

2. Acceptance of a Grant, in the Amount of \$1,000,000, from the [CM 24-495](#) U.S. Department of Housing and Urban Development - Community Project Funding Grant

[Attachment A: Award Letter](#)

[Attachment B: Grant Agreement](#)

*Department: Fire, 5 minutes*

*Requested Action: Consent, November 19th*

3. Human Services 2025-2026 Funding Recommendations [CM 24-482](#)

*Department: Planning and Community Development, 10 minutes*

*Requested Action: Study Session, October 22nd*

4. Redmond Police Department Data Governance Policy [CM 24-483](#)

[Attachment A: ALPR and FLOCK Cameras Draft Data Governance Policy](#)

[Attachment B: Data Governance Policy Questions from Council](#)

*Department: Police, 10 minutes*

*Requested Action: Consent, December 3rd*

5. RPD Police Activity Report Q3 2024 [CM 24-484](#)

[Attachment A: RPD Police Activity Report - October 2024](#)

*Department: Police, 5 minutes*

*Requested Action: Informational*

ADJOURNMENT

*Meeting videos are usually posted by 12 p.m. the day following the meeting at [redmond.legistar.com](http://redmond.legistar.com), and can be viewed anytime on Facebook/YouTube (@CityofRedmond) and OnDemand at [redmond.gov/OnDemand](http://redmond.gov/OnDemand)*



Memorandum

Date: 10/15/2024  
Meeting of: Committee of the Whole - Public Safety and Human Services

File No. CM 24-491  
Type: Committee Memo

TO: Committee of the Whole - Public Safety and Human Services  
FROM: Mayor Angela Birney  
DEPARTMENT DIRECTOR CONTACT(S):

Fire	Adrian Sheppard	425-556-2201
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DEPARTMENT STAFF:

Fire	Micheal Despain	Deputy Fire Chief
Fire	Ameé Quiriconi	Deputy Fire Chief
Fire	Jim Whitney	Deputy Fire Chief

TITLE:  
Fire Department - EMS Transport Fee Program

OVERVIEW STATEMENT:

The Fire Department proposes adopting an EMS Transport Fee to improve revenue in support of the current EMS program as well as come into alignment with all other Private and Fire-based EMS providers in Kings County and the majority of EMS transport systems throughout the state and nation.

We are requesting that Council approve Redmond Fire to implement an EMS Transport billing program and adopt the ordinance modifying the Redmond code to allow this program.

Additional Background Information/Description of Proposal Attached

REQUESTED ACTION:

Receive Information       Provide Direction       Approve

REQUEST RATIONALE:

- **Relevant Plans/Policies:**  
Redmond Fire Department - Strategic Plan 2022-2027
- **Required:**  
RCW 35A.11.020, 35.27.370 (15)
- **Council Request:**  
N/A
- **Other Key Facts:**  
N/A

**OUTCOMES:**

1. If approved, the City of Redmond Fire Department is expected to generate approximately \$650,000 in additional revenue in 2025, \$950,000 in 2026, with a gradual increase each following year based on cost of service, inflation, and the continuation of the Ground Emergency Medical Transport (GEMT) program provided through the State of Washington.
2. The City of Redmond will align with all other Private and Fire-based EMS providers in Kings County and the majority of EMS transport systems throughout the state and nation.
3. The City of Redmond, City of Bellevue, City of Kirkland and Fire District 34 have all agreed to align our billing procedures so there will be no “out of pocket” expense to any resident within this four-agency zone.

**COMMUNITY/STAKEHOLDER OUTREACH AND INVOLVEMENT:**

- **Timeline (previous or planned):**  
In July 2024 the fire department began its community outreach through various methods
- **Outreach Methods and Results:**  
July 2024 - Created FAQ page for the Fire Department website.  
August/September 2024 - Presented program to Fire District 34, meetings with various community groups including OneRedmond,
- **Feedback Summary:**  
All the comments so far are in support of the program as long as we retain the no “out of pocket” policy and have provisions for financial hardship cases.

**BUDGET IMPACT:**

**Total Cost:**

New costs related to the program: Approximately (\$100,000) New Revenue: \$950,000  
Net Difference: +\$850,000 with approximately \$650,000 to City of Redmond and \$200,000 to Fire District 34.

Approved in current biennial budget:  Yes  No  N/A

**Budget Offer Number:**

N/A

**Budget Priority:**

N/A

Other budget impacts or additional costs:  Yes  No  N/A

**If yes, explain:**

The program will require one (1) FTE

**Funding source(s):**

Fees for service

**Budget/Funding Constraints:**

Requires approval from the Centers for Medicare & Medicaid Services and the Washington Healthcare Authority to implement the program.

**Additional budget details attached**

**COUNCIL REVIEW:**

**Previous Contact(s)**

Date	Meeting	Requested Action
4/16/2024	Committee of the Whole - Public Safety and Human Services	Receive Information
5/14/2024	Study Session	Provide Direction

**Proposed Upcoming Contact(s)**

Date	Meeting	Requested Action
11/19/2024	Business Meeting	Approve

**Time Constraints:**

The program will require approximately 30 days from council approval to implement.

**ANTICIPATED RESULT IF NOT APPROVED:**

The General fund will continue to subsidize the program as well as the federal government and private health insurance providers.

**ATTACHMENTS:**

- Attachment A: RFD BLS Ambulance Transport Fee Program - Presentation
- Attachment B: City of Redmond Fire Department Basic Life Support (BLS) Ambulance Services Fee Study - NBS Report - September 23, 2024
- Attachment C: New Municipal Code Chapter (with recommended initial fee amount)
- Attachment D: Redmond Fire Department BLS Transport Billing Policy October 2024
- Attachment E: Redmond Billing Policy Flow Chart
- Attachment F: Redmond Fire Department BLS Transport Financial Assistance Policy 2024

# BLS Ambulance Transport Fee Program

October 15, 2024

Micheal Despain – Interim Deputy Fire Chief



# Background

The vast majority of ambulance providers in the nation bill for EMS treatment and transport services. This model is the same for hospitals, doctor visits, dentist visits, etc. It is how healthcare works in the U.S.

The Redmond Fire Department is one of the last agencies in King County, and the nation, to not charge for ambulance service.

Currently, if you travel outside the City of Redmond and receive ambulance service, you will be charged.

By not charging for ambulance service, the local taxpayer is subsidizing state and federal government agencies, as well as private health insurance companies.

This subsidy can be eliminated by accepting state and federal funding programs that have been in place for many years but not yet implemented.





# Goals

- Access well-established state and federal funding sources to help close the public safety funding gap and lessen the burden on the City's general fund and local taxpayers.
- Ensure sustainability of our EMS program and maintain service levels considering rapid population growth and the rising demand for service.
- Implement a program that aligns with all the other Fire-based EMS transport providers in King County and nationwide.
- Maintain a "no out-of-pocket" cost model for residents.



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## How billing will work

- We will bill private health insurance companies, Medicare, and/or Medicaid (only for BLS transports).
  - Residents will pay nothing out of pocket. We write-off the difference between what we collect from insurance and the remaining balance.
  - Non-Residents (any that does not live or work in Redmond, Bellevue, Kirkland or Fire District 34) will be billed for anything not covered by insurance.
  - We will maintain a write-off policy for those that have financial hardship, similar to that used by hospitals and doctor offices for the same patients they will see after the transport.



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# Our Rate Compared to Neighboring Jurisdictions

- **Redmond: \$1,000 base fee plus \$20 per mile - Proposed**
- Bellevue: \$950 base fee plus \$15 per mile
- Kirkland: \$876 base fee plus \$20 per mile
- Mercer Island: \$1,100 base fee plus \$22 per mile
- Renton: \$1,100 base fee plus \$17 per mile
- Duvall/KCFD45: \$992 base fee plus \$19 per mile



## Arguments in Favor

- Potential for **\$850,000 to \$2,600,000** in additional gross revenue annually.
- Lowers subsidies for private insurance companies and the federal government.
- Currently there is no charge for an EMS transport for a Redmond resident transported by the Redmond Fire Department, however there is a bill if the patient is transported while in Bellevue, Kirkland, Seattle, etc. This program will allow Redmond to align with Bellevue, Kirkland and Fire District 34 so a resident would not have any “out of pocket” expenses in any of these four zones as well.



# Arguments Against

- *“Taxpayers are ‘already paying’ for a portion of the service through property taxes/levy.”*
  - The general fund is essentially subsidizing the portions that the state and federal government have offered to pay, but we have not asked for the funding yet.
- *“Some patients’ might have to pay the co-pay to their insurance, rendering the ‘no out-of-pocket’ argument somewhat imprecise.”*
  - Insurance providers will pay their contracted amount and leave the rest to the City to invoice the patient. In the case of a resident, we will not send the “balance due” notice, rather we will process as a “write-off” against taxes paid in for the EMS levy.



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## Summary

1. Establishing an EMS Transport Fee program aligns the Redmond Fire Department and Fire District 34 with the majority of agencies in King County, as well as agencies throughout the U.S.
2. The City recovers approximately \$650,000 to \$2,000,000 in costs annually.
3. FD34 recovers approximately \$200,000 to \$600,000 in costs annually.
4. Residents of Redmond, FD34, Kirkland and Bellevue will not have an “out of pocket” expense within the whole of the combined service area.

# Next Steps

## 1. Council will need to vote on a Municipal Code amendment

- EMERGENCY MEDICAL SERVICES TRANSPORT FEES

Sections:

- 3.90.010 EMS transport fee imposed.
- 3.90.020 Medicare and Medicaid.
- 3.90.030 Policy and financial assistance.

2. In a follow up meeting, Council will be asked to approve an Interlocal Agreement with Fire District 34 to allow the fire department to bill on behalf of the District. This allows both agencies to align billing procedures and share costs associated with the program.



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September 23, 2024

Michael Despain  
Deputy Fire Chief  
City of Redmond  
8450 161<sup>st</sup> Ave NE  
Redmond, WA 98052

**RE: City of Redmond Fire Department Basic Life Support (BLS) Ambulance Services Fee Study**

Chief Despain:

Thank you for the opportunity to address the City of Redmond's needs for development of a Basic Life Support (BLS) ambulance fee. This document presents the draft final results of the Fee Study, including purpose, project approach, and cost-of-service analysis for calculating the maximum BLS fees for the City.

**Purpose**

The City of Redmond Fire Department (City) proposes to establish fees for ambulance basic life support (BLS) services. The primary purpose in conducting this Fee Study is to ensure that fees do not exceed the costs of providing services and to provide an opportunity for the City Council to set fee amounts according to local cost recovery policies and objectives. Local cost recovery policies and objectives always have significant influence as to whether fees are adopted to recover 100% of the costs of providing services, or less.

This Study identified approximately \$15.5 million in total annual City costs of providing Medical Operations services. Of the \$15.5 million, Table 1 on the next page shows the estimated annual cost distribution to BLS Transports is approximately \$10.3 million with a maximum fee per transport of \$2,809, and to BLS Treatment On Scene is \$432,000 with a maximum fee per service of \$1,860. Total annual costs for other BLS runs that do not result in transport or treatment without transport are \$1.3 million. The costs associated with other calls do not have a fee per transport to be charged. The Fire Department also provides ongoing ALS engine support to BLS medic units on medical calls, at an annual estimated cost of approximately \$3.4 million and no fee per service is calculated since the City already charges an ALS fee and accounts for costs in a separate fund.



**Table 1. Fee Study Summary of Results**

Type of Ambulance Service	Annual Medical Operations Cost Distribution	Maximum Cost per BLS Service
BLS Transports	\$ 10,330,201	\$ 2,809
BLS Non-Transports	\$ 431,631	\$ 1,860
BLS Other Runs	\$ 1,291,840	n/a
ALS Support Runs	\$ 3,396,957	n/a
	<b>\$ 15,450,629</b>	

Total maximum annual cost recovery for BLS services amounts to approximately \$10.8 million. While this study did not delve into projected actual cost recovery based on a billing analysis and payor mix, it is important to note that review of calls for service confirms that not all calls result in an ambulance transport and/or treatment without transport service. Considering calls that do result in an ambulance transport and/or treatment without transport service, there are instances when no bill for service would occur, such as mutual aid response where the City does not provide transport service. Additionally, most bills for ambulance services do not result in full payment. Depending on whether the recipient of a bill is a private or public insurance company, or individual, significant write downs, write offs, and payment delays typically occur. Therefore, projecting total revenue impact from implementation of a BLS fee is not feasible at this time, nor part of our scope of services.

**Project Approach**

This Fee Study is a quantitative effort which compiles the full cost of providing services and translates those costs into proposed fee amounts that are best aligned with how services are provided. The following describes the phases of analysis completed during the Study.

**COST-OF-SERVICE ANALYSIS**

There are two primary types of costs considered in the Fee Study: direct and indirect costs. Direct costs are those that specifically relate to an activity or service, including the real-time provision of the service. Indirect costs are those that support the provision of services in general but cannot be directly or easily assigned to a singular activity or service. The following are examples of different types of direct and indirect costs considered in the Cost-of-Service Analysis:

**Direct Costs:**

- Direct personnel costs – Salary, wages and benefits expenses for personnel specifically involved in the provision of BLS services and activities to the public.
- Direct non-personnel costs – Specific operational expenses incurred in the provision of BLS services.

**Indirect Costs:**

- Indirect personnel costs – Personnel expenses supporting the provision of services and activities. This includes line supervision and departmental management, administrative

support within the Fire Department, and any staff involved in technical support activities related to the direct BLS services provided to the public.

- Indirect non-personnel costs – Expenses other than labor involved in the provision of services. In most cases, these costs are allocated across all services provided by the Fire Department, rather than directly assigned solely to BLS services.
- Overhead costs – These are expenses, both labor and non-labor, related to Citywide support services. Support services include general administrative services such as City Manager, Finance, Human Resources, etc. The amount of costs attributable to the City included in this Study were sourced from the City’s Cost Allocation Plan prepared by the Finance Department.

All cost components in this Study use annual (or annualized) figures, representing a twelve-month fiscal year cycle of expenses incurred by the City in the provision of services. Once the total estimated annual costs of providing services are known, further analysis is completed to identify service costs that may not be eligible for recovery in the fees subject to study.

## **FEE ESTABLISHMENT**

To translate the annual costs of providing BLS services into full cost-recovery individual fee amounts, we applied estimated and/or tracked calls for service counts and analysis of time on task data from calls for service records as the optimal indicator of the level of service provided by the Department.

Fees implemented as a result of this Study should not exceed the calculated full cost of service. In other words, the cost recovery rate achieved by a fee should not be greater than 100%. We calculate the maximum level of cost recovery potential for each fee, and recommend fees always be established by local authority at 100%, or less, than the calculated full cost of service.

While Centers for Medicaid and Medicare Services (CMS) sets limits, or “caps”, for how much a provider can be reimbursed for administering ambulance services, CMS does not regulate how much can be charged to patients or private insurance companies. As such, targets and recommendations always reflect agency-specific judgments linked to a variety of factors, such as existing City policies, revenue objectives, economic goals, community values, market conditions, level of demand, and others. Because this element of the Study is subjective, the results of this study provide the cost-of-service calculation based on 100% full cost recovery, as well as the framework for the City to adjust fee amounts in accordance with the City’s goals as pertains to cost recovery, economic development, and social values.

## **DATA SOURCES**

The following data sources were provided by the City and used to support the cost-of-service analysis and fee establishment phases of this Study:

- Adopted Budget for Calendar Year (CY) 2024
- A complete list of the Fire Department’s personnel, salary/wage rates, paid benefits, etc.
- Approximately one year of Calls for Service data records

The City's adopted budget is the most significant source of information affecting cost of service results. We did not audit or validate the City's financial management and budget practices, nor was cost information adjusted to reflect different levels of service or any specific, targeted performance benchmarks. This Study has accepted the City's budget as a legislatively adopted directive describing the most appropriate and reasonable level of City spending.

## Fee Analysis and Results

This section of our report presents more detailed analysis supporting the results summarized in Table 1, above.

A full range of fire and paramedic services are provided by the City's Fire Department. These services can be summarized into four main service delivery programs for purposes of this analysis:

- **Fire Administration & Fire Support Services** – Leadership for the personnel and programs of the department. Also responsible for budgeting, planning, directing, and team building. Sets and reviews department policy and provides administrative support to all of the Fire Department's divisions. Coordinates all aspects of employee training, keeping current with the local, state, and federally mandated training requirements. Maintenance of all apparatuses and equipment.
- **Fire Suppression and Operations Response** – Emergency response related to fire incidents and other types of emergencies.
- **Medical Operations** – Ambulance response services that typically result in transport to a hospital or treatment on-scene without transport.
- **Fire Prevention** – Annual inspections of commercial buildings, development review, Fire Code permits, investigative and code enforcement activities, etc.

The focus of this Study is on fees to be charged under the Medical Operations program for BLS ambulance services provided by the City. The following is the list of fees studied:

- **BLS Transport**– A specific level of pre-hospital medical care where a transport is provided by trained responders focused on rapidly evaluating a patient's condition; maintaining a patient's airway, breathing, and circulation; controlling external bleeding; preventing shock; and preventing further injury or disability by immobilizing potential spinal or other bone fractures. BLS generally does not include the administration of drugs or invasive skills.
- **BLS Treatment On Scene** – A fee for services applied when the City responds to an emergency call for service, administers care at the scene, and does not transport the patient to hospital.

The focus of this cost-of-service analysis is to reasonably estimate the total annual costs of providing BLS ambulance services that can be recovered through fees for services. Table 2 on the following page presents the total cost of service analysis for the City's Fire Department, segregated into the main service delivery programs:

**Table 2. Total Fire Department Service Costs**

Cost Element	Fire Suppression and Operations	Medical Operations	Fire Prevention	TOTAL
Labor	\$ 6,049,295	\$ 11,387,539	\$ 2,844,920	\$ 20,281,753
Recurring Non-Labor	2,156,079	3,080,702	650,275	5,887,057
Department Admin	2,068,662	3,647,596	881,176	6,597,433
<b>DEPARTMENT SUBTOTAL</b>	<b>\$ 10,274,036</b>	<b>\$ 18,115,836</b>	<b>\$ 4,376,371</b>	<b>\$ 32,766,243</b>
Other Funding Sources				
EMS Tax Levy		\$ (2,665,207)		\$ (2,665,207)
<b>OTHER FUNDING SOURCES SUBTOTAL</b>		<b>\$ (2,665,207)</b>		<b>\$ (2,665,207)</b>
<b>DEPARTMENT TOTAL</b>	<b>\$ 10,274,036</b>	<b>\$ 15,450,629</b>	<b>\$ 4,376,371</b>	<b>\$ 30,101,036</b>

As shown, the total cost of providing all Department services is approximately \$30.1 million. Medical Operations services are approximately \$18.1 million. However, before proceeding further in calculating BLS fees for service, the Emergency Medical Services (EMS) Tax levy providing approximately \$2.7 million per year in funding for these services is shown as an offset to Medical Operations costs. The resulting \$15.5 million in Medical Operations costs represents approximately 51% of the total Department costs. The following sub-sections describe the analysis used to establish each resulting Cost Element for the Medical Operations annual total cost outcome.

**DIRECT LABOR COSTS**

The amount of “Labor” costs shown in Table 2 for Medical Operations Services is established as follows.

The City operates three Medic One units which administer BLS level support during EMS calls. City firefighters are cross trained as Emergency Medical Technicians (EMTs) providing basic life support (BLS) services to sick or injured people, as well as fire, rescue, and non-emergency service calls, among other activities.

As to how resources are deployed for EMS response, there are three (3) medic units currently in service, seven (7) days per week, twenty-four (24) hours per day. The three (3) medic units in service are supported by six (6) paramedic fire engines on BLS calls, or other calls that require BLS level support. Each time a medic unit responds to a call for service, a paramedic engine accompanies that medic unit to provide medically necessary support to the medic unit and personnel inside it. Each medic unit is staffed with two people, both are paramedic firefighters. Each paramedic engine is staffed with three people: a captain or lieutenant, an engineer, and a firefighter. All personnel on engines are paramedics.

Because the City accounts for salaries and benefit expenses for all paramedic personnel in one central accounting/budgetary unit (Fire and Medical Operations – Fire Suppression), a method for allocating direct labor costs between suppression and medical service categories is needed. Calls for Service data shows most responses by the Department are EMS rather than suppression related. The City’s calls for EMS represent approximately 68% of all calls for service. To estimate the amount of salaries and benefits costs dedicated to Medical Operations, 68% of personnel costs within the budget unit called Fire and Medical

Operations – Fire Suppression, were allocated to Table 3’s Medical Operations category, while the remaining 32% of personnel costs were allocated to Fire Suppression and Operations.

Labor costs specifically excluded from Medical Operations include: USAR, Hazardous Materials, Wildland Deployment, ARPA funded services, Fire Prevention, and training specific to these activities. These services should not be funded by the BLS fees calculated in this Study.

**RECURRING NON-LABOR COSTS**

Review of the City’s adopted expenditure budget for CY 2024 identified on-going operating costs that are attributable to the provision of Fire Suppression and Medical Operations services. The same methodology of allocating costs is applied to non-personnel expenditures as described above for Direct Labor based on the ration of medical to suppression calls for service. These are shown in Table 2 and further detailed in Table 3, below.

**Table 3. Medical Operations Costs**

Accounts	Sum of Medical Operations
00310 - Office Supplies	\$ 5,117
00320 - Fuel	5,822
00350 - Small Tools <\$10K	7,492
00360 - Operating Supplies	61,346
00365 - Meals	73
00370 - R&M Supplies	2,780
00409 - Intergovernmental Professional Services	401,062
00410 - Professional Service	3,797
00412 - Legal Services	3,526
00420 - Shipping & Postage Services	586
00421 - Phones & Internet Services	10,300
00422 - Wireless Phone Services	25,050
00430 - Travel	3,390
00440 - Advertising Services	170
00450 - Rental or Lease of Equip or Property	5,085
00470 - Cable Service & Misc Utilities	2,373
00474 - Waste Collection Services	2,373
00480 - Outside Repairs & Maint (Non Software)	65,470
00485 - Software License/Transaction Fees	678
00490 - Miscellaneous Services	5,972
00491 - Tuition, Training & Registrations	568
00495 - Printing Services	12,257
00961 - Interfund Medical	1,752,262
00965 - Interfund Workers Comp	703,154
<b>Grand Total</b>	<b>\$ 3,080,702</b>

Out of approximately \$4.5 million budgeted annually for Fire Suppression and Fire Station Support Services, approximately \$3.1 million are operating costs dedicated to providing Medical Operations services.

Non-Labor costs excluded from Medical Operations include: Urban Search and Rescue (USAR), Hazardous Materials, Wildland Deployment, American Rescue Plan Act (ARPA) funded services, Fire Prevention, and training specific to these activities. These services should not be funded by the BLS fees calculated in this Study.

**OVERHEAD COSTS**

There are two types of overhead costs considered in this analysis: Citywide overhead and Fire Department overhead. Citywide overhead costs include administrative services that support the Fire Department such as Finance, Human Resources, City Manager, Information Technology, etc. The City’s Finance Department completes an overhead cost allocation plan analysis, which for CY 2024 identifies approximately \$2 million in overhead costs attributable to the Fire Department. In addition to Citywide Overhead costs, Fire Department Overhead costs of approximately \$4.6 million should be shared across all Fire Department service categories. Table 4 shows the total identified overhead costs applied in the Fee Study.

**Table 4. Total Overhead Cost Summary**

Cost Element	Total Overhead Costs
Fire Department Overhead	\$ 4,555,385
Citywide Overhead	2,042,048
<b>TOTAL OVERHEAD COST</b>	<b>\$ 6,597,433</b>

Total overhead costs shown in Table 4 were allocated to Fire Department service categories. The portion of costs allocated to Medical Operations is approximately \$3.6 million, as shown in Table 2.

**Total Annual Cost Allocation Summary**

Based on the analysis completed for each attributable cost component described above, Table 2 summarizes the City’s total estimated annual cost of providing Medical Operations services at approximately \$15.5 million. As described, the total estimated cost of providing services includes all identifiable direct and indirect costs.

**INDIVIDUAL FEE-FOR-SERVICE COSTS**

To translate the total annual EMS costs established in Table 2 into individual costs per type of ambulance service, Medical Operations costs were allocated to individual fee-for-service categories based on the average number of calls by type of ambulance service provided, and the average amount of time required on task to service each type of call. Both calls by type and average time on task per call were sourced from the Fire Department’s calls for service records

Utilizing calls-for-service data provided by the City’s dispatch system, a weighted distribution factor was derived by call volume and call time on task for Transports, Treatment On Scene, and Other Calls. Each time an ambulance responds to a call for service, a paramedic engine accompanies the medic unit too for

incident support. Therefore, service time must reflect the total number of personnel responding to each call, on average:

- Two-person ambulance – EMTs/Firefighters
- Three-person paramedic Engine – Captain or Lieutenant, Engineer and Firefighter. Each of these people are also Paramedics.

Then the fee schedule for individual services must reflect the type of ambulance service provided, defined as follows:

- **BLS Transports** are defined as calls that consist of a patient being transported to the hospital by medic unit. Transports last an average of approximately 67 minutes per call.
- **BLS Treatment On Scene** are defined as calls where treatment was administered on the scene, but the ambulance did not transport the patient to a hospital, also known as “Dry Run.” Dry Runs last an average of 44 minutes.
- **BLS Other Runs** are defined as calls that do not result in a Transport or Treatment On Scene, such as calls that are cancelled before the medic unit reaches the scene, or there is no one to treat on scene. These calls last an average of 20 minutes.
- **ALS Support Runs** are defined as paramedic engine support to medic units on EMS calls. The engine support average call time assisting medic units is 41 minutes.

Per the calls for service data analysis that incorporates both number of calls and average time on task per call by type of ambulance service, Table 5 shows the annual distribution of Medical Operations costs required for BLS service calls as 67% Transports, 3% Treatment On Scene, 8% Other Calls, and 22% ALS Support Runs. Dividing annual Medical Operations Costs to each service type category by total number of annual calls results in an average cost of service per BLS Transports and Treatment On Scene of \$2,809 and \$1,860, respectively.

**Table 5. Average Total Cost Per Type of Ambulance Service**

Type of Ambulance Service	Total Annual EMS Calls	Average Service Time (hrs) - BLS Ambulance	Average Service Time (hrs) - Engine	Total Service Time (hrs)	Annual Service Time (hrs)	% Distribution	Annual Medical Operations Cost Distribution	Maximum Cost per BLS Service
BLS Transports	3,678	2.22	3.33	<b>5.55</b>	20,419	67%	\$ 10,330,201	\$ <b>2,809</b>
BLS Treatment On Scene	232	1.47	2.21	<b>3.68</b>	853	3%	\$ 431,631	\$ <b>1,860</b>
BLS Other Runs	1,512	0.68	1.01	<b>1.69</b>	2,554	8%	\$ 1,291,840	n/a
ALS Support Runs	3,275	-	2.05	<b>2.05</b>	6,715	22%	\$ 3,396,957	n/a
	<b>8,696</b>				<b>30,541</b>	<b>100%</b>	<b>\$ 15,450,629</b>	

BLS Other Runs are incidents where the medic unit was cancelled before reaching the scene, or there is no one to treat on scene. Although there are costs associated with such incidents, these runs have no potential for recovery of costs through fees for BLS Transport or Treatment On Scene.

Since ALS supports BLS medic units on calls, costs associated with ALS Support Runs must be a part of the cost distribution as reflected in Table 5. These calls have no potential recovery of costs through fees for BLS Transport or Treatment On Scene.

## Conclusion

The approach and methods used to determine the total estimated annual and per service cost for BLS ambulance services is in line with industry standards our professional team has worked with for over 20 years, in hundreds of fee studies, for a variety of government services applications. Based on the outcomes presented herein, the proposed schedule of fees for City Council’s consideration can be found in the City’s accompanying Staff Report.

*Disclaimer: In preparing this report and the opinions and recommendations included herein, NBS has relied on a number of principal assumptions and considerations with regard to financial matters, conditions and events that may occur in the future. This information and assumptions, including the City’s budgets, time estimate data, and workload information from City staff, were provided by sources we believe to be reliable; however, NBS has not independently verified such information and assumptions. While we believe NBS’ use of such information and assumptions is reasonable for the purpose of this report, some assumptions will invariably not materialize as stated herein and may vary significantly due to unanticipated events and circumstances. Therefore, the actual results can be expected to vary from those projected to the extent that actual future conditions differ from those assumed by us or provided to us by others.*



CODE

**CITY OF REDMOND  
ORDINANCE NO. \_\_\_\_\_**

AN ORDINANCE OF THE CITY OF REDMOND ADOPTING  
A NEW CHAPTER 3.88 OF THE REDMOND MUNICIPAL  
CODE TO RECOVER CERTAIN COSTS OF PROVIDING  
BASIC LIFE SUPPORT EMERGENCY MEDICAL SERVICES  
TRANSPORT, PROVIDING FOR SEVERABILITY, AND  
ESTABLISHING AN EFFECTIVE DATE

---

WHEREAS, the City of Redmond currently provides basic life support ("BLS") emergency medical services ("EMS") and BLS emergency medical services transport ("BLS Transport") without charge; and

WHEREAS, pursuant to RCW 35A.11.020, as an exercise of the power granted by RCW 35.27.370(15), the City Council of the City of Redmond has discretion to charge fees to those receiving EMS Transport from the City; and

WHEREAS, such BLS Transport user fees are often covered by medical insurance policies, including but not limited to Medicare and Medicaid; and

WHEREAS, funds derived from the voter approved King County Levy are insufficient to fully fund the City's BLS Program and BLS Transport costs; and

WHEREAS, as a result, BLS Program and BLS Transport services must be subsidized by funds from the City's General Fund; and

WHEREAS, a portion of the taxes paid by City residents contribute to the General Fund and to the provision of the BLS Program and BLS Transport costs; and

WHEREAS, the City Council finds that those benefiting from the City's BLS Transport should be charged a fee to reimburse the City for at least some portion of the cost of the BLS Transport.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF REDMOND, WASHINGTON, DO ORDAIN AS FOLLOWS:

Section 1. Classification. This ordinance is of a general and permanent nature and shall become a part of the Redmond Municipal Code.

Section 2. Adoption of Chapter. A new chapter 3.88 is hereby adopted to read as follows:

EMERGENCY MEDICAL SERVICES TRANSPORT FEES

Sections:

- 3.88.010 EMS transport fee imposed.
- 3.88.020 Medicare and Medicaid.
- 3.88.030 Policy and financial assistance.

3.88.010 EMS transport fee imposed.

A. All persons receiving emergency medical services transport ("EMS transport") by the city's fire department after November 1, 2024, shall be charged and billed an EMS transport fee ("the fee"). The initial fee is set at one thousand dollars per transport plus twenty dollars per mile.

The fee will be reviewed annually, and, effective January 1st of each year, may be administratively increased by an adjustment to reflect the current published annual change in the Seattle Consumer Price Index for Wage Earners and Clerical Workers as needed in order to maintain the cost recovery objectives established by the city council with a comprehensive fee study at least every fifth year.

The chief operations officer or designee shall establish a procedure to implement, bill, and collect fees.

B. A resident of the city, or an employee transported from their place of employment within the city, who supplies the city with the medical insurance information and documentation needed to bill their insurance provider for the fee, and who assigns their insurance benefits for the same to the city, shall not be billed for that portion of the fee that is in excess of amounts paid by their insurer(s).

C. A person who does not meet the criteria set forth in subsection (B) of this section, who supplies the city with the medical insurance information and documentation needed to bill their insurance provider for the fee, and who assigns their insurance benefits for the same to the city, shall be billed for that portion of the fee that is in excess of amounts paid by their insurer(s).

D. A person, regardless of residence or status as an employee within Redmond, who does not supply the city with the medical insurance information and documentation needed to bill their insurance provider or who fails to assign such benefits to the city because they are unwilling, or because they do not have any type of insurance coverage for such charges, may be billed for the entire fee.

E. The fee herein imposed shall not apply to persons transported by the city's fire department from jurisdictions outside the city's boundaries so long as those jurisdictions do not charge an EMS transport fee.

F. The city may enter into agreements with surrounding cooperating EMS transport agencies to bill patients under the same provisions as that of a resident of Redmond in reciprocity for the same consideration given to the residents of Redmond.

G. The use of the term "insurance" or any variation thereof in this section shall include Medicare, Medicaid, or any other state or federally recognized medical insurance program.

H. The use of the term "EMS transport" in this section shall mean transportation by ground ambulance vehicle and the provision of medically necessary supplies and services, including BLS ambulance services as defined by the state

(Chapter 18.73 RCW). The ambulance must be staffed by an individual who is qualified in accordance with state and local laws as an emergency medical technician basic (EMT basic). Basic emergency medical technicians perform noninvasive, basic emergency treatment.

3.88.020 Medicare and Medicaid.

Charges for the EMS transport authorized by this chapter shall be construed and implemented in a manner consistent with Medicare and Medicaid requirements, including a Ground Emergency Medical Transport (GEMT) program, when applicable. If any method or procedures authorized by this chapter for the purpose of establishing, implementing, imposing or collection of charges for EMS transport is found to conflict with Medicare and/or Medicaid requirements, the conflicting part of this chapter shall be inoperative to the extent the same conflicts with Medicare and/or Medicaid requirements. The operation of the remainder of this chapter shall remain unaffected.

3.88.030 Policy and financial assistance.

A. The city's policy is that ability to pay is not a condition of service. All aspects of emergency medical services the city currently provides, including EMS transport, shall be provided to all patients without

discrimination toward those with no ability or inadequate means to pay.

B. The chief operations officer or designee shall establish a program consistent with criteria and rules set forth in WAC 246-453-001 through 246-453-060 to provide financial assistance and debt forgiveness to persons that do not have the ability to pay for some or all of the fee.

Section 3.      Severability. If any section, sentence, clause or phrase of this ordinance should be held to be invalid or unconstitutional by a court of competent jurisdiction, such invalidity or unconstitutionality shall not affect the validity or constitutionality of any other section, sentence, clause or phrase of this ordinance.

Section 4.      Effective date. This ordinance shall become effective five days following the date of publication of a summary in the city's official newspaper or as otherwise provided by law.

ADOPTED by the Redmond City Council this \_\_\_\_\_ day of \_\_\_\_\_,  
2024.

CITY OF REDMOND

\_\_\_\_\_  
ANGELA BIRNEY, MAYOR

ATTEST:

\_\_\_\_\_  
CHERYL XANTHOS, MMC, CITY CLERK

(SEAL)

APPROVED AS TO FORM:

\_\_\_\_\_  
DANIEL P. KENNY, CITY ATTORNEY

FILED WITH THE CITY CLERK:  
PASSED BY THE CITY COUNCIL:  
SIGNED BY THE MAYOR:  
PUBLISHED:  
EFFECTIVE DATE:  
ORDINANCE NO.

## BASIC LIFE SUPPORT TRANSPORT BILLING POLICY

### Policy:

It is the policy of the City of Redmond (the City) to bill third-party payers and patients for emergency medical services (EMS) transportation user fees in a fair, equitable and consistent manner.

### Responsibilities:

The City or its billing contractor will conduct billing and collection according to the guidelines included in this policy.

### Definitions:

- 1) Resident: A person living within the boundaries of the City. Until otherwise specified, for purposes of EMS transport billing only, persons who live or work within the boundaries of the Redmond, Bellevue, Kirkland and King County Fire District 34 will be treated as residents in reciprocity with these cooperating agencies. The City reserves the right to add to or remove from this list of cooperating agencies.
- 2) Third-party payer: Medicare, Medicaid, private medical insurance, supplemental medical insurance, Labor and Industries industrial insurance, accidental-injury insurance and or any other insurance payer that may be properly billed for emergency medical transportation fees.

### Guidelines:

- 1) City of Redmond Billing Procedure for Third-Party Payers: The City will bill third-party payers according to the City's existing rate schedule, which may be amended from time to time. The City will send no more than three bills to a third-party payer related to an individual transport incident. If no payment is received within thirty (30) days after the final billing, the City may assign the account to a collection agency to collect that portion of the transport fee for which the third-party payer is responsible.
- 2) Medicaid Patients: Pursuant to federal law and the patient's indigent status, the City will accept that amount paid on behalf of any Medicaid patient (regardless of resident status), along with any available supplemental insurance payment, as full and final payment of the transport fee and will write off the balance.
- 3) Patients Who Have Other Insurance:
  - i) Residents: The City will bill the third-party payer(s) and will accept the amount received from the third-party payer(s) as payment in full. Any remaining balance will be written off in consideration for EMS levy taxes paid by the resident patient. If the



patient has no insurance (private pay), 100% of the bill will be written off in consideration of EMS levy taxes paid by the resident.

ii) Non-Residents: In addition to billing the third-party payer(s), the City will take the following actions, which the City deems to constitute good faith efforts to collect unpaid balances:

(a) Send three bills directly to the non-resident patient for any amounts that are legally collectable and not paid by the third-party payer(s). Medicare patients may only be billed for unmet Part B deductible and copayment.

(b) Any amounts not collected within thirty days after the third and final billing will be reviewed by the Fire Chief, who will make to recommended to the Finance Director for collection, write off by the City or such other action as deemed appropriate.

4) Patients Who Have Not Provided Complete Insurance Information or Patients Who Have Not Signed Authorizations:

i) The City will send a bill directly to the transported patient along with:

(1) a request for additional insurance information

(2) And/or a request for authorization to bill insurance,

(3) And an application for financial assistance along with information about our financial assistance policy in case the patient is not a resident.

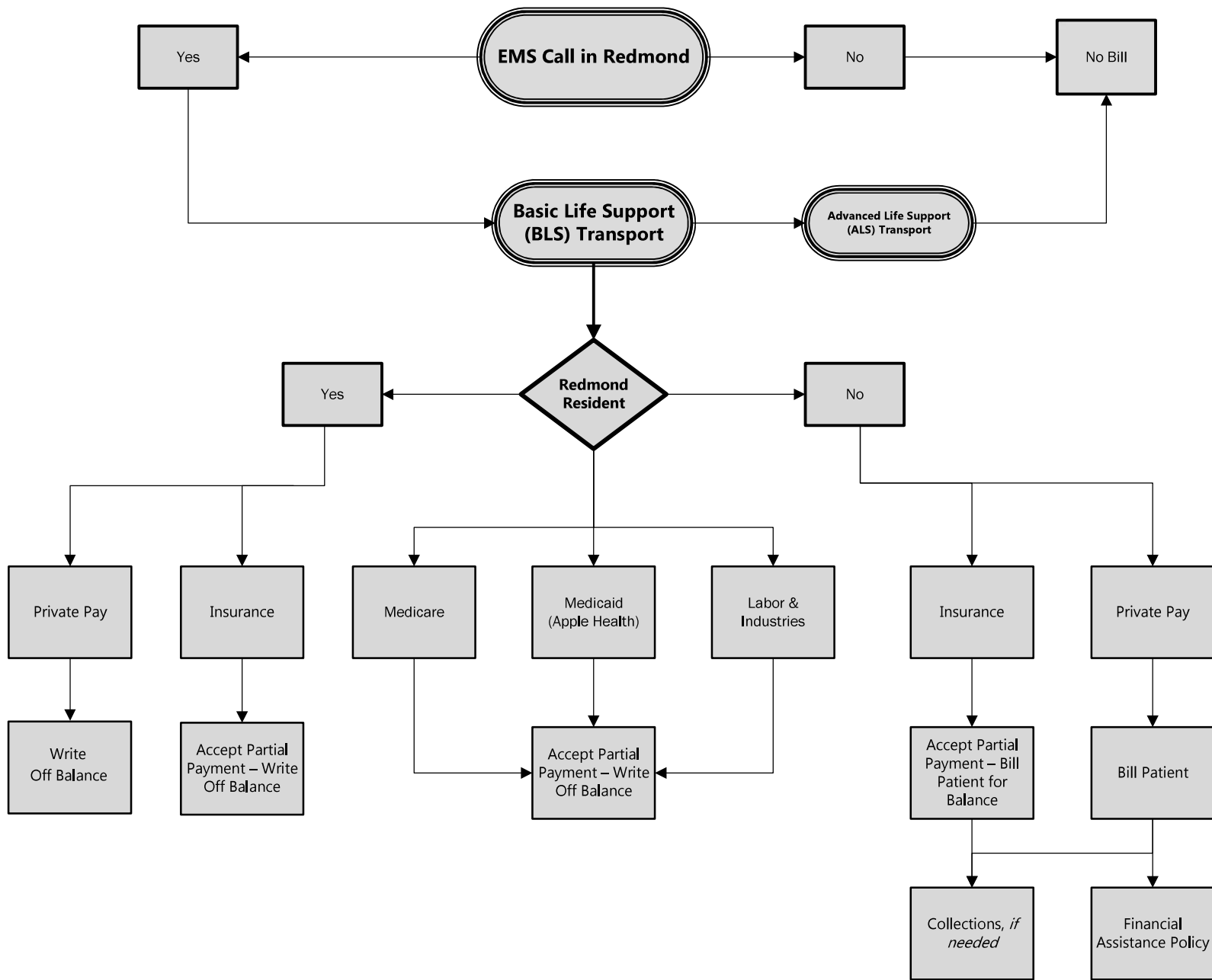
ii) If no response is received prior to sending subsequent bills, requests for insurance information and/or authorization and information about our Financial Assistance Policy will be included along with these bills.

iii) Any amounts not collected within thirty days after the third and final billing will be reviewed by the Fire Chief, who will make to recommended to the Finance Director for collection, write off by the City or such other action as deemed appropriate.

5) Reasonable payment arrangements will be extended for amounts not eligible for debt forgiveness under the Financial Assistance Policy. Monthly payments, without interest, may be arranged. If three consecutive monthly payments are missed, the account will be reviewed by the Fire Chief, who will make to recommended to the Finance Director for collection, write off by the City or such other action as deemed appropriate.

6) Patients transported from locations outside the City (or cooperating agency) will not be charged the transport fee so long as the jurisdiction does not charge a fee, in accordance RMC 3.90.010 (e).

- 7) Financial Assistance: The City reserves the right to waive any transport fee on a case-by-case basis in accordance with the City's Financial Assistance Policy.



## Redmond Fire Department BLS Transport Financial Assistance Policy

The following criteria for provision of financial assistance to emergency medical services (EMS) transport users are consistent with the requirements of [WAC 246-453-001 through 246-453-060](#) for hospital charity care. However, this policy is not intended to adopt any provisions stated therein except to the extent required to provide a financial assistance policy that meets the criteria established by law to qualify for reimbursement from third parties. If a conflict exists between the provisions of this policy and the law, the law will govern to the extent necessary to remain eligible for such reimbursement. If no such conflict exists, this policy will govern.

### Policy:

It is the City of Redmond (the City) and Fire Department policy that the ability to pay is never a condition of or impediment to emergency medical service or transportation. All aspects of pre-hospital service will be provided to all patients without discrimination toward those with no or inadequate means to pay.

The most recent Federal Poverty Guidelines (updated annually in February) shall be used to evaluate eligibility for financial assistance. The City, following guidelines described below, shall extend financial assistance to qualifying individuals.

Financial Assistance applications are available upon request through the EMS billing service responsible for obtaining approval signatures for write-offs from the City at the time each application is processed. The billing service will report financial assistance account activity, and the amount of EMS financial aid to the City on a regular basis.

### Definitions:

*“Financial Assistance”* is reducing or canceling a debt owed to the City for EMS transportation

*“Responsible Party”* is the individual responsible for the payment of any EMS transport user fees not covered by third-party sponsorship.

*“Third-Party Coverage”* and *“Third-Party Sponsorship”* means an obligation on the part of an insurance company or governmental program which contracts with medical service providers and patients to pay for the care of covered patients and services.

*“Guarantor”* is a person or entity that agrees to be responsible for another's debt or performance under a contract

### Responsibilities:

The billing service provides financial assistance applications to patients upon request, collects completed applications and supporting documentation, and forwards applications to the Fire Department for review when received.

The City reviews documentation requesting financial assistance against established guidelines and makes a determination of qualification. The Fire Chief or designee will review the application and make a recommendation to the Finance Director who signs the section of the application indicating either approval or denial of financial assistance. The

application is returned to the billing service after review. A copy of the financial assistance determination is kept on file for future reference.

The billing service will provide a summary of financial assistance account activity no less than monthly.

**Guidelines:**

1. The following criteria will be used in making fair, equitable, and consistent decisions regarding eligibility for financial assistance.
2. Ability to pay is never a condition of emergency medical service or transportation.
3. Financial assistance is secondary to all other financial resources available to the patient including insurance, government programs, or other third-party sponsorship.
4. Full debt forgiveness will be provided to a responsible party with a gross family income at or below 200% of current, published Federal Poverty Income Guidelines (<https://aspe.hhs.gov/>)
5. Financial assistance will be provided according to Federal Poverty Income Guidelines and the sliding scale below:

<b>2024 Poverty Guidelines</b>				
<b>Persons in Family</b>	<b>100%</b>	<b>200%</b>	<b>300%</b>	<b>400%</b>
1	\$15,060	\$30,120	\$45,180	<b>\$60,240</b>
2	\$20,440	\$40,880	\$61,320	<b>\$81,760</b>
3	\$25,820	\$51,640	\$77,460	<b>\$103,280</b>
4	\$31,200	\$62,400	\$93,600	<b>\$124,800</b>
5	\$36,580	\$73,160	\$109,740	<b>\$146,320</b>
6	\$41,960	\$83,920	\$125,880	<b>\$167,840</b>
7	\$47,340	\$94,680	\$142,020	<b>\$189,360</b>
8	\$52,720	\$105,440	\$158,160	<b>\$210,880</b>
For each additional person, add	\$5,380	\$10,760	\$16,140	\$21,520

	<b>200% or below</b>	<b>201% - 300%</b>	<b>301% to 400%</b>	<b>&gt;400%</b>
<b>Financial Assistance Provided</b>	<b>100%</b>	50%	25%	0%

6. Requests for financial assistance may be initiated by sources such as; a physician, community or religious groups, social services, hospital personnel, the patient, guarantor, or family member. The City will use the application process through the billing service to determine initial interest in an qualification for financial assistance. The City's decision to provide financial assistance has no bearing on the responsible party's financial obligations to other healthcare providers.
  - a. Applications for financial assistance are available from the billing service upon request.
  - b. The City shall base its decision on the suitability of financial assistance and the amount of debt forgiveness upon data submitted by the responsible party or other parties as defined above.
  - c. Documents submitted that demonstrate a grant of financial assistance from the receiving medical facility, for medical care on the date of transport, shall be deemed evidence of qualification of financial assistance. Upon presentation of such documentation and an application through the billing service, the City will grant proportionally equivalent financial assistance.
  - d. Any one of the following documents shall be considered sufficient evidence upon which to base the determination of financial assistance eligibility (income information may be annualized as appropriate):
    - i. A "W-2" withholding statement for the most recent tax year
    - ii. Current Pay Stubs
    - iii. An income tax form from the most recent tax year
    - iv. Forms approving or denying eligibility from Medicaid and/or state-funded medical assistance programs
    - v. Forms approving or denying unemployment compensation or written statements from employers or welfare agencies
  - e. All documentation shall be forwarded from the billing service to the Fire Department for review and City approval. The Fire Chief or designee will review the documentation and make a recommendation to the Finance Director who signs the section of the application indicating either approval or denial of financial assistance. The application is returned to the billing service after review. A copy of the financial assistance determination is kept on file by both the Fire Department and the billing service for future reference.
  - f. A letter notifying the applicant of the City's financial assistance determination will be sent by the billing service on behalf of the Fire Department to all applicants.
7. Financial assistance may be provided to a responsible party with gross family annual income greater than 400% of Federal Poverty Income Guidelines if circumstances such as; extraordinary non-discretionary expenses, future earning capacity, and the ability to make payments over an extended period of time warrant such consideration.
8. Reasonable payment arrangements, consistent with the responsible party's ability to make payments, will be extended for amounts not eligible for debt forgiveness. Monthly payments, without interest, may be arranged.

9. Financial assistance determinations made by the City may be appealed to the Chief Operating Officer (COO)
10. The City realizes that certain persons may have no financial means to pay for their BLS transport user fee, and also lack the social network/family necessary to help them complete the paperwork required to apply for financial assistance. In these cases, the City may approve financial assistance even if no formal application has been submitted. The billing service will notify the Fire Department when such situations occur, and the Fire Department will evaluate the financial need on a case-by-case basis.

### **Individual Written Notice of Financial Assistance**

It is the policy of the City of Redmond Fire Department that no person will be denied emergency medical care because of an inability to pay for such services.

The City of Redmond Fire Department will provide needed emergency service without charge or at a reduced cost without discrimination to those persons with documented inadequate or no means to pay for care.

To be eligible to receive needed ambulance transport services without charge or at a reduced cost, you or your family's gross annual income must be at or below levels established by national poverty guidelines for this area.

You may also qualify for financial assistance from the City of Redmond Fire Department if you have been granted financial assistance by the medical facility to which you were transported.

If you think you may be eligible for Financial Assistance under this policy, please complete and sign the application below, attach the required income documentation, or provide a grant of "hospital charity" and submit the completed application packet to:

City of Redmond Fire Department  
C/O Systems Design  
P.O. Box 3510  
Silverdale, WA 98383

You will be notified of the determination made in your request for financial assistance and any reduction in your charges once the Fire Department has reviewed your application.



# Redmond Fire Department BLS Transport Financial Assistance Policy

<b>Patient's Name:</b>				
Contact Phone:				
Date of Service:				
Hospital transported to:				
<b>Responsible Party:</b>				
Name: (if different from patient)				
Relationship:				
Current Employer:				
Employed From:				
Previous Employer:				
Spouse Employer:				
Employer From:				
Previous Employer:				
<b>Income:</b>	Family Member 1	Family Member 2	Family Member 3	Family Member 4
Name:				
Relationship				
Wages:				
Self Employment:				
Public Assistance:				
Social Security:				
Unemployment:				
Worker's Comp:				
Child Support:				
Pension/Retirement				
Other Income:				
<b>Total Income:</b>				

Please attach documentation of any listed income such as W-2's, pay stubs, tax returns, or forms approving or denying eligibility from Medicaid and/or state-funded medical assistance, forms approving or denying unemployment compensation or written statements from employers or welfare agencies.

Was *Charity Care* granted by the receiving medical facility? **Yes** **No**  
**Yes, please attach documentation of the charity care decision by the receiving medical facility.**

**The above information is correct to the best of my knowledge. I hereby authorize the City of Redmond Fire Department to verify this information for the purpose of financial assistance eligibility determination.**

\_\_\_\_\_  
**Signature (Patient or Responsible Party)** **Date**

*(City use only)*

<b>Current Account Balance:</b>	<b>Adjustment by City</b>	<b>New Balance:</b>

\_\_\_\_\_  
**Signature (City of Redmond Fire Department)** **Date**



Memorandum

Date: 10/15/2024  
Meeting of: Committee of the Whole - Public Safety and Human Services

File No. CM 24-495  
Type: Committee Memo

TO: Committee of the Whole - Public Safety and Human Services  
FROM: Mayor Angela Birney  
DEPARTMENT DIRECTOR CONTACT(S):

Fire	Adrian Sheppard	425-556-2201
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DEPARTMENT STAFF:

Fire	Micheal Despain	Deputy Fire Chief
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TITLE:

Acceptance of a Grant, in the Amount of \$1,000,000, from the U.S. Department of Housing and Urban Development - Community Project Funding Grant

OVERVIEW STATEMENT:

The City of Redmond, in partnership with the City of Bellevue, applied for funding through the U.S. Department of Housing and Urban Development - Community Project Funding Grant program to help offset the costs associated with the purchase of electric fire engines and the supporting electrical charging infrastructure. In March 2024, the City of Redmond was notified of an award for \$1,000,000, to be shared with the City of Bellevue (\$500,000 to Redmond, \$500,000 to Bellevue). The grant requires no matching funds. Reimbursement will be provided after the project is completed, which is expected in Q1-2025.

This request is for Council to accept the grant on behalf of the Cities of Redmond and Bellevue, and to direct staff to sign an agreement between the City of Redmond and the U.S. Department of Housing and Urban Development regarding the use of funds, and to sign an Interlocal Agreement between the City of Redmond and the City of Bellevue for the pass-through of \$500,000 to the City Bellevue once both projects are completed and the City of Redmond receives full reimbursement for the grant.

Additional Background Information/Description of Proposal Attached

REQUESTED ACTION:

Receive Information       Provide Direction       Approve

REQUEST RATIONALE:

- **Relevant Plans/Policies:**  
City of Redmond - Environmental Sustainability Action Plan (ESAP) - September 2020 Redmond Fire Department - Strategic Plan 2022-2027
- **Required:**

Council approval is required for grant acceptance

- **Council Request:**  
N/A
- **Other Key Facts:**  
N/A

**OUTCOMES:**

Implementing the use of electric fire engine will help achieve the goals set by both cities in terms of lowering the use of fossil fuels, lowering the production of CO2 within our fleets, lowering routine maintenance cost, and reducing noise levels during routine/non-emergency operation of the vehicles in the community. However, the barrier to wider adoption of this technology is due to the high cost of the new technology (electric fire engines) and the additional cost associated with installing and upgrading the electrical infrastructure needed to support these new units. This federal grant will help lower the cost of deploying these electric fire engines and allow Redmond and Bellevue to demonstrate the effectiveness of this new technology to fire agencies across the nation. Redmond and Bellevue received partial funding through the Washington State Department of Ecology in 2023 but this funding covers just under 25% of the full cost of implementation. By accepting the U.S. HUD grant, the projects will become more competitive against the purchase of traditionally diesel-powered fire engines.

**COMMUNITY/STAKEHOLDER OUTREACH AND INVOLVEMENT:**

- **Timeline (previous or planned):**  
N/A
- **Outreach Methods and Results:**  
Various social media posts regarding the progress of the assembly of the electric fire engine
- **Feedback Summary:**  
N/A

**BUDGET IMPACT:**

**Total Cost:**

WA Dept of Ecology 25% grant = \$587,154

City of Redmond 75% matching funds portion before the HUD grant = \$1,761,464

City of Redmond cost after HUD grant = \$1,261,464\*

\*The Fire department has also secured additional donations from various corporations to help further reduce the City's portion to approximately \$965,400

Approved in current biennial budget:  Yes  No  N/A

**Budget Offer Number:**

N/A

**Budget Priority:**

Safe and Resilient

Other budget impacts or additional costs:  Yes  No  N/A

If yes, explain:

N/A

Funding source(s):

Grant

Budget/Funding Constraints:

Funding will be received after the completion of the project, which is estimated for Q4-2025

Additional budget details attached

**COUNCIL REVIEW:**

Previous Contact(s)

Date	Meeting	Requested Action
N/A	Item has not been presented to Council	N/A

Proposed Upcoming Contact(s)

Date	Meeting	Requested Action
11/19/2024	Business Meeting	Approve

Time Constraints:

The deadline to complete the project and receive eligible funding is August 31, 2032, but we believe the project will be completed in Q4-2025.

**ANTICIPATED RESULT IF NOT APPROVED:**

The difference in costs will need to be covered by the General Funds of both cities.

**ATTACHMENTS:**

Attachment A: Award Letter from the U.S. Dept of Housing and Urban Development re: Grant B-24-CP-WA-2259

Attachment B: FY2024 Community Project Funding Grant Agreement No. B-24-CP-WA-2259 (Draft)



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, D.C. 20410-1000

OFFICE OF COMMUNITY PLANNING AND DEVELOPMENT

Wednesday, August 28, 2024

Michael Despain  
Interim Deputy Chief  
The City of Redmond  
8450 161st Avenue NE  
Redmond, WA 98052  
Email: mdespain@redmond.gov

Dear Community Project Funding Grantee,

In the Consolidated Appropriations Act, 2024 (Public Law 118-42) (the FY2024 Act), and the Further Consolidated Appropriations Act, 2024 (Public Law 118-47) (the Further FY2024 Act) Congress made \$3,290,054,336 in funding available for Community Project Funding (CPF). These CPF awards are administered by the Department of Housing and Urban Development (HUD). HUD received the information below about your project from Congress. A Grant Number has been added and will be the unique identifier for your project throughout the grant process.

**Grant Number:** B-24-CP-WA-2259  
**Project:** Bellevue and Redmond Electric Fire Engines & Charging Infrastructure  
**Grantee/Recipient:** The City of Redmond  
**Amount:** \$1,000,000  
**HUD Grant Officer:** Rommel Calderwood / Rommel.Calderwood@hud.gov  
**HUD System Officer:** Connor X. Lareau / Connor.X.Lareau@hud.gov  
**HUD Regional Environmental Officer:** Brian Sturdivant / Brian.Sturdivant@hud.gov

This letter outlines initial grant award requirements and information needed from you to get started. This Grant Award Package also includes: The “FY2024 Community Project Funding Grant Guide” (FY2024 CPF Grant Guide), the template for your FY2024 Community Project Funding Grant Agreement, and the forms required to complete and submit information online to populate before we sign your FY2024 CPF Grant Agreement. A brief overview of these documents is below:

- 1) **FY2024 CPF Grant Guide:** The FY2024 CPF Grant Guide provides instructions for completing the requested information and filling out the required administrative forms to initiate your FY2024 CPF Grant Agreement. Please refer to this document as it includes important information and forms for accessing the online system (DRGR), as well as other information concerning reporting requirements.

**2) FY2024 CPF Grant Agreement for this Award:** The FY2024 CPF Grant Agreement specifies the applicable statutory provisions, regulations, and administrative requirements for this award. Please make sure all grantee information and award-specific information is entered completely and accurately before signing this Agreement. When you submit your grant materials on our DRGR Grant Processing Module it will create your customized FY2024 CPF Grant Agreement.

**3) Standard Forms and Required Materials:** The following forms will be needed:

- a. Form HUD-1044, Assistance Award/Amendment Form (Attached)
- b. Standard Form–424 Application for Federal Assistance (in the online system)
- c. SF-424-B, Assurances for Non construction Programs, and/or SF-424-D, Assurances for Construction Programs (in the online system)
- d. SF-LLL Disclosure of Lobbying Activities (as applicable in the online system):  
<https://www.grants.gov/forms/forms-repository/sf-424-family>
- e. SF-1199A - Direct Deposit Sign-Up Form: <https://www.gsa.gov/system/files/SF1199A-20.pdf> The form is to be completed by the grantee and grantee's financial institution. Grantees will need to submit the completed form and upload to DRGR.

### **Grant Award Process Overview**

Below is a step-by-step walk-through of the process and necessary documents and forms to execute your FY2024 CPF Grant Agreement. This process and the forms are also available in the FY2024 CPF Grant Guide, which can also be found on the program's webpage at:

[https://www.hud.gov/program\\_offices/comm\\_planning/edi-grants/FY\\_2024](https://www.hud.gov/program_offices/comm_planning/edi-grants/FY_2024) on HUD.gov and on this webpage <https://www.hudexchange.info/programs/cpf/> on the HUD Exchange.

1. Grantees should review the Grant Award Package documents.
2. Grantees should initiate or complete the HUD environmental review.
3. Grantees gather all required information and submit to HUD using the online system DRGR.
4. HUD provides access to DRGR system to access the Grant Processing Module to submit required information, answer questions, and upload documents. Once all required information is submitted online HUD will review the completed grant materials submitted.
5. HUD staff will review the information and documents for completeness. If there are any deficiencies the corrections and/or clarifying questions will be shared with the grantee for correcting or answering the clarifying questions. If not, HUD staff will submit the package internally for a second level review. Then, the Acting Director for the Congressional Grants Division will review the grant package. Finally, your Grant Agreement will be executed.
6. HUD will notify the grantee that their FY2024 Grant Agreement has been fully executed and will share additional materials with the grantee to complete to begin the payment processing activities to receive your funds.

## **Training and Tools**

**FY2024 CPF Onboarding Event:** This event will take place in September. We will review this letter and grant award package materials along with sharing next steps and how to sign up for a cohort. The event will be recorded and shared online after the event.

**FY2024 CPF Grantee Cohorts:** This provides you and your staff the opportunity to register for a four-part training for how to prepare your grant materials and submit them online. Information about the registration will be shared via email and during the FY2024 CPF Onboarding Event.

**FY2024 CPF Grantee Webinar Series:** This provides you and your staff with information about the regulations, requirements, and processes for your grant. Information about the registration for the webinar series will be shared via email and during the FY2024 CPF Onboarding Event.

**FY2024 CPF Grantee Online HUD Exchange Resources:** This website page includes general information and your specific Fiscal Year information along with links to past and future technical assistance opportunities. The site is also used for you to register for our listserv and for communicating updates to you and those on the listserv.

## **Overview of Requirements**

CPF grants are subject to several Federal requirements. HUD will provide additional information and further clarification regarding applicable requirements and the grant award process in upcoming webinars and additional technical assistance. The most essential requirements include:

- 1) **Administrative Requirements:** CPF grants are subject to the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR Part 200).
- 2) **HUD Environmental Review Requirements:** EDI/CPF grants, like all projects funded by HUD, are subject to requirements under the National Environmental Policy Act (NEPA), HUD's NEPA-implementing regulations at 24 CFR Part 50 or 24 CFR Part 58, and appropriate federal environmental and historic preservation laws, regulations, and Executive Orders.
  - To be eligible, activities and expenses must comply with applicable Federal requirements. This includes administrative requirements under 2 CFR Part 200, environmental laws, statutes and Executive Orders, and other "cross-cutting" federal requirements adhered to by HUD.
  - If the environmental review is being conducted by a local government responsible entity under Part 58, a Request for Release of Funds and Certification must be approved by HUD, as applicable. If the environmental review is being completed by HUD under Part 50, the environmental review must be approved and certified by HUD.

- HUD defines the “Federal Nexus” for a program or project as the event that triggers the requirements for federal environmental review under a host of laws, regulations, and Executive Orders, including the prohibition on choice limiting actions.
- For FY2024 grants, the date of the Act's enactment (March 9, 2024) is the federal nexus for compliance with all environmental laws. Once a project is federalized, in keeping with the National Environmental Policy Act (NEPA) and HUD’s NEPA-implementing regulations at 24 CFR Part 50 or 24 CFR Part 58, environmental reviews must be completed, and all necessary HUD approvals must be obtained prior to taking any choice limiting actions, such as acquisition, construction, ground disturbance, and entering into contracts.
- Further explanation and guidance on choice limiting actions and the environmental review process, including historic preservation review, is included within the CPF Grant Guide and on the program’s webpage at: <https://www.hudexchange.info/programs/cpf/>.
- Some projects may already be underway at the time of federal nexus and while it is still best practice to stop all work after the federal nexus before the environmental review is complete for EDI/CPF projects that are already underway at time of federal nexus, grantees are allowed to perform activities after the federal nexus, but only for activities which are part of a pre-nexus contract that obligates them to do so. However, grantees would be doing so at their own risk, as any activity performed, or proposed to be performed, after the federal nexus must be included in the project scope of a satisfactory environmental review to be reimbursable.
- A satisfactory review must show that the project activities will not result in unmitigable environmental harm and must not preclude consultation with the appropriate environmental authorities such as the State Historic Preservation Office (SHPO). Environmental authorities may refuse to consult if physical impacts are made to a site before consultation.
- HUD conducted a nationwide environmental review for FY24 EDI/CPF soft costs to clear activities such as administrative, planning, and operations and maintenance costs (including costs to prepare an environmental review). After execution of the Grant Agreement, eligible soft costs can be incurred after March 9, 2024 (see 2 CFR 200.403). Eligible hard costs can be reimbursed if incurred after a full environmental review is completed (see 2 CFR 200.403).
- HUD Environmental Officers:  
<https://www.hud.gov/sites/dfiles/CPD/documents/Community-Project-Funding-Portfolio-Assignments.pdf>.

If you, or your staff, have any questions regarding how to complete or submit the requires documents, please feel free to contact your Grant Officer or System Officer. Please note while your Grant Officer may change over time, we have a team approach to managing your project. Please include your grant number and project in all email correspondence. We look forward to working with you on this important project!

Sincerely,



Nadab Bynum  
Acting Deputy Assistant Secretary  
for Economic Development



Assistance Award/Amendment		U.S. Department of Housing and Urban Development Office of Administration											
1. Assistance Instrument <input type="checkbox"/> Cooperative Agreement <input checked="" type="checkbox"/> Grant		2. Type of Action <input checked="" type="checkbox"/> Award <input type="checkbox"/> Amendment											
3. Instrument Number B-24-CP-WA-2259	4. Amendment Number	5. Effective Date of this Action	6. Control Number										
7. Name and Address of Recipient The City of Redmond 8450 161st Avenue NE Redmond, WA 98052  EIN: UEI:		8. HUD Administering Office CPD, Congressional Grants Division 451 7th Street, SW, Rm 7146 Washington, DC 20410-7000											
		8a. Name of Administrator	8b. Telephone Number										
10. Recipient Project Manager Michael Despain		9. HUD Government Technical Representative Rommel Calderwood Rommel.Calderwood@hud.gov											
11. Assistance Arrangement <input type="checkbox"/> Cost Reimbursement <input type="checkbox"/> Cost Sharing <input checked="" type="checkbox"/> Fixed Price	12. Payment Method <input type="checkbox"/> Treasury Check Reimbursement <input type="checkbox"/> Advance Check <input checked="" type="checkbox"/> Automated Clearinghouse	13. HUD Payment Office Chief Financial Officer											
14. Assistance Amount		15. HUD Accounting and Appropriation Data											
<table border="1"> <tr><td>Previous HUD Amount</td><td></td></tr> <tr><td>HUD Amount this Action</td><td>\$1,000,000.00</td></tr> <tr><td>Total HUD Amount</td><td>\$1,000,000.00</td></tr> <tr><td>Recipient Amount</td><td></td></tr> <tr><td>Total Instrument Amount</td><td>\$1,000,000.00</td></tr> </table>		Previous HUD Amount		HUD Amount this Action	\$1,000,000.00	Total HUD Amount	\$1,000,000.00	Recipient Amount		Total Instrument Amount	\$1,000,000.00	15a. Appropriation Number	15b. Reservation Number EDE 24
Previous HUD Amount													
HUD Amount this Action	\$1,000,000.00												
Total HUD Amount	\$1,000,000.00												
Recipient Amount													
Total Instrument Amount	\$1,000,000.00												
		Amount Previously Obligated											
		Obligation by this Action											
		Total Obligation											

16. Description  
Bellevue and Redmond Electric Fire Engines & Charging Infrastructure

This Award consists of the following items which are appended to and hereby made part of this Award:

- (A) Cover Page - HUD 1044
- (B) Grant Agreement

**Instructions:**

NO PROJECT FUNDS may be committed to the project or drawn down prior to environmental release of funds approval.

Locate your nearest HUD Regional Environmental Officer at

<https://www.hudexchange.info/programs/environmental-review/hud-environmental-staff-contacts/-region-i-regional-and-field-environmental-officers>.

Disclaimer: The information on this form is to be used only for purposes of recordkeeping and facilitating communication between the Recipient identified in box 7 above (which is also referred to as the "Grantee") and the U.S. Department of Housing and Urban Development ("HUD") in relation to the award identified above ("this award").

This document does NOT constitute the grant agreement for this award.

The terms and conditions for this award are as specified in the grant agreement signed by HUD and the Grantee

17. <input type="checkbox"/> Recipient is required to sign and return three (3) copies of this document to the HUD Administering Office.	18. <input checked="" type="checkbox"/> Recipient is not required to sign this document.
19. Recipient (By Name): Michael Despain	20. HUD (By Name):



Previous Editions are Obsolete

form HUD-1044 (8/90)  
Ref. Handbook 2210.17



Memorandum

**Date:** 10/15/2024

**File No.** CM 24-482

**Meeting of:** Committee of the Whole - Public Safety and Human Services

**Type:** Committee Memo

**TO:** Committee of the Whole - Public Safety and Human Services

**FROM:** Mayor Angela Birney

**DEPARTMENT DIRECTOR CONTACT(S):**

Planning and Community Development	Carol Helland	425-556-2107
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**DEPARTMENT STAFF:**

Planning and Community Development	Seraphie Allen	Deputy Director
Planning and Community Development	Brooke Buckingham	Human Services Manager
Planning and Community Development	Alaric Bien	Senior Planner

**TITLE:**

Human Services 2025-2026 Funding Recommendations

**OVERVIEW STATEMENT:**

Staff will share an update on the 2025-26 funding process and general themes arising from the Human Services Commission discussions.

**Additional Background Information/Description of Proposal Attached**

**REQUESTED ACTION:**

**Receive Information**       **Provide Direction**       **Approve**

**REQUEST RATIONALE:**

- **Relevant Plans/Policies:**  
Redmond Municipal Code 4.30 Human Services Commission [REDMOND MUNICIPAL CODE \(codepublishing.com\)](https://www.codepublishing.com/WA/Redmond/)  
[≤https://www.codepublishing.com/WA/Redmond/](https://www.codepublishing.com/WA/Redmond/)  
Human Services Strategic Plan [Human Services Strategic Plan <](https://www.redmond.gov/DocumentCenter/View/22520/2022-Human-Services-Strategic-Plan)  
[https://www.redmond.gov/DocumentCenter/View/22520/2022-Human-Services-Strategic-Plan>](https://www.redmond.gov/DocumentCenter/View/22520/2022-Human-Services-Strategic-Plan)
- **Required:**  
N/A
- **Council Request:**

N/A

• **Other Key Facts:**

Every two years, the City invites application proposals for Human Services funding from non-profits providing services in the community. In accordance with Chapter 4.30 of the Redmond Municipal Code, the Human Services Commission reviews all requests for funding of human services and makes recommendations to the Mayor and City Council. Recommendations address how to grant the City’s human services funds for the provision of a range of services to Redmond residents, including food, mental health support, shelter, job assistance, and more.

126 applications were received (22 more than in the last biennium), with requests totaling over \$5.4M per year, which was an increase of 38%. Including the City’s per capita formula, Community Development Block Grant, and opioid settlement funds, approximately \$2.6M/year has been budgeted for allocation. The review and award of proposals to be considered for Community Development Block Grant (CDBG) funding is incorporated in this process. Due to limited CDBG funding, funded programs may include both CDBG and general funds.

**OUTCOMES:**

This is an informational briefing in anticipation of the upcoming Joint Study Session with the Human Services Commission scheduled for October 22, 2024.

**COMMUNITY/STAKEHOLDER OUTREACH AND INVOLVEMENT:**

• **Timeline (previous or planned):**

Semi-monthly meetings with Human Services Commission April through September 2024.

• **Outreach Methods and Results:**

Human Services Commission meetings are posted online, with opportunities for the public to provide comment in writing, by calling in, or in person.

• **Feedback Summary:**

Public comment was received in support of

- Chinese Information and Service Center
- Redmond Toddler Group
- Imagine Housing
- LifeWire
- Kinderling Center
- Kids Quest Museum - Noticias

Public Comment was received in opposition to funding for

- Imagine Housing

**BUDGET IMPACT:**

**Total Cost:**

Budgeted estimates: \$2.2M/year (General Fund); \$35,000 (CDBG); and \$400K/year (opiate funds)

**Approved in current biennial budget:**

Yes

No

N/A

**Budget Offer Number:**  
0000307

**Budget Priority:**  
Vibrant and Connected

**Other budget impacts or additional costs:**     Yes     No     N/A

**If yes, explain:**

Costs associated with administering contracts and monitoring performance.

**Funding source(s):**  
General Fund, Community Development Block Grant (CDBG), opioid settlement funds

**Budget/Funding Constraints:**  
The 2025-26 Human Services funding recommendations will be presented to Council by the Human Services Commission and will be approved as part of the overall adopted budget.

**Additional budget details attached**

**COUNCIL REVIEW:**

**Previous Contact(s)**

Date	Meeting	Requested Action
7/16/2024	Committee of the Whole - Public Safety and Human Services	Receive Information
9/17/2024	Committee of the Whole - Public Safety and Human Services	Provide Direction

**Proposed Upcoming Contact(s)**

Date	Meeting	Requested Action
10/22/2024	Study Session	Receive Information

**Time Constraints:**  
Constrained by the budget schedule.

**ANTICIPATED RESULT IF NOT APPROVED:**  
N/A

**ATTACHMENTS:**  
N/A



Memorandum

Date: 10/15/2024

Meeting of: Committee of the Whole - Public Safety and Human Services

File No. CM 24-483

Type: Committee Memo

TO: Committee of the Whole - Public Safety and Human Services

FROM: Mayor Angela Birney

DEPARTMENT DIRECTOR CONTACT(S):

Police	Chief Darrell Lowe	425-556-2521
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DEPARTMENT STAFF:

Police	Brian Coats	Deputy Police Chief
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**TITLE:**

Redmond Police Department Data Governance Policy

**OVERVIEW STATEMENT:**

The Redmond Police Department is presenting a policy to govern the ethical use of Automated License Plate Readers (ALPR) and Drones as First Responders (DFR). Incorporating feedback from Council, this policy outlines principles of transparency, accountability, and privacy protection, while detailing the authorized purposes, data collection, retention practices, and security measures for both technologies. By establishing clear guidelines and oversight mechanisms, the policy ensures compliance with legal standards and fosters public trust in law enforcement's use of advanced technology.

The Police Department is seeking Council’s approval of this governance policy.

Additional Background Information/Description of Proposal Attached

**REQUESTED ACTION:**

Receive Information       Provide Direction       Approve

**REQUEST RATIONALE:**

- **Relevant Plans/Policies:**  
Redmond Police Department ALPR and DFR Data Governance Policy
- **Required:**  
N/A
- **Council Request:**  
The data governance policy was requested by Council at the April 9, 2024 Study Session.
- **Other Key Facts:**  
N/A

**OUTCOMES:**

The implementation of this policy is expected to enhance public safety through the effective use of Automated License Plate Readers (ALPR) and Drones as First Responders (DFR) while safeguarding privacy and civil liberties. By establishing clear guidelines, data retention limits, and accountability measures, the policy will ensure that these technologies are used responsibly and ethically. Outcomes include improved operational efficiency, strengthened community trust through transparency, and enhanced ability to support investigations, locate stolen vehicles, and respond to emergencies, all while minimizing risks of misuse.

**COMMUNITY/STAKEHOLDER OUTREACH AND INVOLVEMENT:**

- **Timeline (previous or planned):**  
N/A
- **Outreach Methods and Results:**  
N/A
- **Feedback Summary:**  
N/A

**BUDGET IMPACT:**

**Total Cost:**  
N/A

**Approved in current biennial budget:**       Yes       No       N/A

**Budget Offer Number:**  
228

**Budget Priority:**  
Safe and Resilient

**Other budget impacts or additional costs:**       Yes       No       N/A

*If yes, explain:*  
N/A

**Funding source(s):**  
General Fund

**Budget/Funding Constraints:**  
N/A

**Additional budget details attached**

**COUNCIL REVIEW:**

**Previous Contact(s)**

Date	Meeting	Requested Action
4/9/2024	Study Session	Provide Direction

**Proposed Upcoming Contact(s)**

Date	Meeting	Requested Action
12/3/2024	Business Meeting	Approve

**Time Constraints:**

N/A

**ANTICIPATED RESULT IF NOT APPROVED:**

N/A

**ATTACHMENTS:**

Attachment A: ALPR and Flock Cameras Draft Data Governance Policy

Attachment B: Data Governance Policy Questions from Council

## Policy 4XX ALPR and FLOCK Cameras

### 4XX.1 PURPOSE AND SCOPE

The Redmond Police Department is committed to the responsible and ethical use of technology. The purpose of this policy is to establish guidelines for the responsible and ethical use of Automated License Plate Readers (ALPR) and Flock Cameras by the Redmond Police Department. This policy aims to ensure that the deployment and utilization of these technologies are conducted in a manner that respects privacy, civil liberties, and public trust and are consistent with state law, city policy and WASPC accreditation standards.

License Plate Readers (LPRs) use cameras to photograph vehicles and license plates. LPR technology used by the Redmond Police Department includes Automatic License Plate Readers (ALPR) as part of the Axon Fleet camera system and stationary Flock cameras installed in strategic locations around the city. This technology is for authorized law enforcement and public safety purposes as set forth in this policy.

This policy applies to the use of LPR cameras and associated information by all Department employees. This policy governs the use of LPR data, to enable the collection and use of such data in a manner consistent with respect for individuals' privacy and civil liberties.

The department shall maintain transparency in the use of LPR technologies and inform the public about their purposes, capabilities, and the safeguards in place to protect individual rights.

Officers and personnel involved in the use of these technologies will be held accountable for their actions and adherence to this policy. Violations will result in disciplinary action, up to and including termination, in accordance with departmental procedures, City policy, and collective bargaining agreements.

#### 4XX.1.1 DEFINITIONS

**LPR Administrator:** A Department employee who manages the utilization of the LPR software from the end user through training, reporting, and monitoring.

**Automated License Plate Reader (ALPR):** A feature of the AXON Fleet in-car camera system that uses cameras and computer technology to compare digital images of license plates to lists of known plates of interest.

**Hit:** Alert from the LPR system that a scanned license plate number may be in the NCIC or other law enforcement database for a specific reason including, but not limited to, being related to a stolen vehicle, wanted person, missing person, domestic violence protective order, or other criminal activity.

**Hot List:** License plate(s) associated with vehicles of interest from databases that include, but not limited to: National Crime Information Center (NCIC), Washington Crime Information Center (WACIC), Department of Licensing (DOL) databases, and local Be on the Lookout notices (BOLOs).



**Reads:** Data obtained by an ALPR of license plates within public view that were read by the device, including images of the plate and vehicle on which it was displayed, and information regarding the location of the police vehicle at the time of the ALPR read.

#### **4XX.2 POLICY**

LPR data will be used solely for law enforcement purposes. Any non-law enforcement usage of LPR data is strictly prohibited. LPR data will not be used to intentionally capture images in private area or areas where a reasonable expectation of privacy exists, nor shall it be used to harass, intimidate, or discriminate against any individual or group.

LPR systems will only be deployed for official law enforcement purposes. Examples of these include:

- Locating stolen vehicles and stolen license plates
- Locating wanted, endangered or missing persons; or those violating protection orders
- Canvassing the area around a crime scene

LPR data will only be accessed by trained, RPD employees for official law enforcement purposes. This access is limited to search of specific or partial plate(s) and/or vehicle identifiers as related to any of the following:

- A criminal investigation
- A search for a wanted person or person of interest
- Community caretaking functions, such as locating an endangered or missing person

Any data obtained from LPR technology will be used and handled pursuant to this policy and applicable city, state, and federal laws.

This policy will be reviewed regularly to ensure it remains current and consistent with technological advancements, legal requirements, best practices in data governance, and City policy.

#### **4XX.3 GENERAL OPERATING PROCEDURES FOR VEHICLE ALPR**

Operators will activate the ALPR software and ensure that it is operational at the beginning of their shift. Operators will notify the ALPR Administrator upon discovery of any damaged or inoperable ALPR equipment.

The system will automatically update the hot list at the start of each shift.

When an operator receives a hit/alert indicating a positive hit from the hotlist database, a digital image of the license plate will be displayed on the mobile data computer screen.

LPR operators will compare the digital image of the license plate to the hotlist information to verify the hit for both the state and characters on the plate.

LPR operators will confirm the LPR information by radio or Mobile Data Computer (MDC) to immediately confirm the hit prior to taking enforcement or other type of police action (absent exigent circumstances).

The system will upload ALPR data accumulated from the shift.

#### **4XX.4 COLLECTION, STORAGE AND RETENTION OF DATA**

LPR technology collects digital images of license plates and associated license plate numbers. The technology collects the date and time that the license plate passes a digital-image site where an LPR is located. No additional personally identifiable information will be collected without legal justification.

Only trained department employees can access stored LPR data, and the system logs all data search requests.

The system stores data from Patrol ALPR and Flock cameras for no longer than 30 days. After the 30-day period, the data will be purged unless it related to an ongoing investigation or legal requirement. In those circumstances the applicable data should be downloaded from the server and entered into evidence.

Detectives will retain LPR data related to a criminal investigation in the investigation case file for a period in accordance with state retention laws.

The department and City have robust security measures currently in place in compliance with CJIS data security, and the cities cyber-insurance carrier requirements to protect the data from unauthorized access or breaches.

#### **4XX.5 REVIEW OF LPR DATA**

Only authorized personnel may access LPR data and only in conjunction with a call for service or investigation. Employees accessing LPR data must login through the password-protected system. The system records when an employee accesses LPR data by logging the employee's name, the date, and the time of the request. Employees will not share LPR passwords and login credentials.

Employees conducting searches in the LPR System will provide a case number and justification for the search. If a case number does not exist, the employees will provide thorough justification for the legitimacy and lawful purpose of the search.

Regular audits will be conducted to ensure compliance with this policy.

#### **4XX.6 RELEASING OR SHARING LPR DATA**

LPR data will only be shared with other law enforcement or prosecutorial agencies for official law enforcement purposes or as otherwise permitted by law. In addition, the Redmond Police Department will only share LPR data with other agencies when the investigation relates to a violation of Washington State Law or is tied to the City of Redmond. The Redmond Police Department will not share LPR data with other agencies for the purpose of locating or tracking persons wanted solely for

administrative reasons, such as immigration law violations, or for violations in other jurisdictions that would not otherwise warrant investigation in Redmond.

Requests for LPR data by non-law enforcement or non-prosecutorial agencies will be processed by the Records Unit pursuant to the applicable Rules of Civil or Criminal Discovery or the Washington Public Records Act, Ch. 42.56 RCW.

#### **4XX.7 TRAINING**

Before employees operate the ALPR system or access LPR data, they will complete department training on the proper and lawful use of the system. The Training Unit will coordinate with the LPR Administrator to provide this training.

The LPR training will emphasize proper use, data handling procedures, ethical considerations outlined in this policy, and the requirement to document the reason for any data inquiry.

Additionally, all ALPR Operators will maintain ACCESS Level 1 Certification pursuant to ACCESS WACIC and NCIC.

The LPR Administrator will maintain a list of all employees trained in the use of the LPR equipment and systems and update user access.

#### **4XX.8 Public Reporting**

The department will engage in community outreach and education efforts to inform the public about the use of these technologies, their benefits, and the safeguards in place to protect privacy and civil liberties.

The department will include in its published annual report details on the use of LPR technologies, including data on their deployment, effectiveness, and any privacy or civil liberties issues encountered.

Any incidents of misuse or abuse of these technologies will be handled in accordance with established department policy, State law, and Accreditation standards reporting requirements.

Data Governance Policy Questions from Council - July 2024

Q #	Document Language	Question	Response
1	...purpose of this policy...establish guidelines for the responsible and ethical use of (ALPR) and (DFR)... to ensure deployment and utilization ... consistent with state law, city policy and WASPC accreditation standards.	What statutes (state or city) does the use of this tech fall under?	<p>- WA State does not have legislation addressing license plate readers.</p> <p>- While RMC 10.25 does address Automated Traffic Safety Cameras, the definition would not apply to ALPR.</p> <p>- No City Policy that regulates ALPR</p> <p>- Proposed policy is consistent with the last WASPC model policy (2008)</p>
2	Misuse or abuse will be subject to disciplinary action.	Please point us to what these disciplinary actions are and where Council can review.	This language removed as redundant. See question 16.
3	The department will prioritize the protection of individual privacy and minimize the collection and retention of personally identifiable information (PII).	How will prioritization occur?	This occurs by placing default restrictions and settings in the technology. Examples include pointing fixed LPRS in such a manner that does not show the driver and pointing drone cameras to the horizon during flight so as not to capture images from the air during travel over uninvolved areas.
4	The deployment of ALPR and DFR technologies will be guided by ethical standards, including fairness, non-discrimination, and respect for civil liberties.	Again, where are these written down for Council to review? As discussed, it was stated that RPD does not share with out of state agencies or ICE. It would be beneficial for Council to know where these current policies reside for our review and understanding.	<p>Ethics - See RPD Policy 102, Law Enforcement Code of Ethics</p> <p>See also RPD Policy 413 Immigration Violations. This is also re-stated in the proposed policy under the section for releasing or sharing data.</p> <p><a href="https://www.redmond.gov/1901/Redmond-Police-Department-Policy-Manual">https://www.redmond.gov/1901/Redmond-Police-Department-Policy-Manual</a></p>
5	Automatic License Plate Readers	Please provide a map of where these are to be installed.	Will Include

6	ALPR technology will only be used for legitimate law enforcement purposes, such as identifying stolen vehicles, locating wanted or missing individuals, and supporting investigations.	"supporting open investigations." Based on the conversations had in chambers, it sounded to me like tech would be used only in "current and open" investigations. Please clarify / add modifier.	Language changed to "a criminal investigation" and "ongoing investigation".
7	ALPR systems will collect license plate data, including the date, time, and location of the vehicle. No additional PII will be collected without legal justification.	Cross reference examples of legal justification.	Language changed to "No additional personally identifiable information is collected." The tech does not have the ability to gather more info that what it sees in the digital image.
8	Collected data will be retained for a period no longer than 30 days unless it is related to an ongoing investigation or legal requirement.	Personally in favor of 7 or 14 day retention.	30 days is standard practice currently being used nationwide
9	Data older than 30 days will be automatically purged from the system.	Is this a feature from the provider or is this manually done in-house?	This is an automatic feature for both.
10	The department and City have robust security measures currently in place in compliance with CJIS data security, and the cities cyber-insurance carrier requirements to protect the data from unauthorized access or breaches.	Please provide materials for Council to read and understand.	Access to all relevant data is controlled by the WA State Patrol. A Central Computerized Enforcement Service System (ACCESS) Level I certification is required. At the City level, other safeguards such as the Personnel Manual Section 11.200 and two factor authentication are in place.
11	Regular audits will be conducted to ensure compliance with this policy.	How regular? Will they be scheduled or surprise?	Audits will be conducted annually at a minimum. Unannounced audits could also take place at the department's discretion or as part of an internal investigation due to an allegation of misconduct or misuse.

12	DFR technology will be used to enhance situational and operational awareness, support search and rescue operations, and provide real-time information.	This implies that is the ONLY allowed use. If that is correct, please add the modifier.	Language changed to the "purpose of drone technology is to.." as opposed to "will be used to"
13	Drones will collect visual and audio data necessary for the mission at hand. Data collection will be minimized to what is necessary for the purpose of the operation.	Will facial recognition software be used? How will individual's privacy be protected if they are in the data but not a part of the "mission at hand".	There is no facial recognition software, and no plans to use such. Privacy protections vary from case-to-case, and video/audio are redacted before release per the Public Records Act.
14	Access to drone data will be restricted to authorized personnel only. The department will implement robust security measures to protect the data from unauthorized access or breaches.	Would love to hear from TIS on this. I'm not sure if this sort of conversation about security measures could occur in Exec Session but I would be amenable to sensitive topics being discussed in ES.	See earlier question regarding ACCESS certification and standard TIS security protocols.
15	Annual Report	Who decides if an issue rises to the level of reporting back to Council? Will this information also be wrapped into our RPD Dashboard?	The department will prepare a comprehensive annual report, and Council is free to request any additional information they would like to see. Yes, most if not all of the information will be available on the dashboard.
16	Any incidents of misuse or abuse of these technologies will be handled in accordance with established department policy , State law , and Accreditation standards reporting requirements.	Please provide policy for reference.Please provide RCW for reference.Please provide [accreditation] information for reference.	Possible disciplinary actions are the same ones found in the City Personnel Manual Ch 12, and any relevant Collective Bargaining Agreement.Discipline ranges from a verbal warning to termination depending on the level of misconduct.If misconduct occurs and is reportable per WASPC or CJTC guidelines, the department will comply.

17	Recommended Addition	6.2 This policy does not attempt to supersede any RCW...etc. (similar to the language at the end of nearly all our ordinances)	The policy already defers to all existing laws.
18	The department has in place mechanisms for ongoing monitoring and enforcement of this policy to ensure compliance by all personnel.	Such as? Can you point us to a document to read?	This sentence removed from the revised policy as redundant. The policy restrictions, audits, and reference to disciplined will suffice.



Memorandum

**Date:** 10/15/2024

**Meeting of:** Committee of the Whole - Public Safety and Human Services

**File No.** CM 24-484

**Type:** Committee Memo

**TO:** Committee of the Whole - Public Safety and Human Services

**FROM:** Mayor Angela Birney

**DEPARTMENT DIRECTOR CONTACT(S):**

Police	Chief Darrell Lowe	425-556-2521
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**DEPARTMENT STAFF:**

Police	Brian Coats	Deputy Police Chief
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**TITLE:**

RPD Police Activity Report Q3 2024

**OVERVIEW STATEMENT:**

This presentation summarizes policy activity for the third quarter of 2024, including comparisons to the first half of the previous two years. Key metrics such as Calls for Service, Arrests, Auto Thefts, Residential Burglaries, Shoplifting incidents, Traffic Collisions, Property Crimes, Violent Crimes, and Drone as a First Responder deployments are highlighted. Additionally, it provides an overview of the recent jewelry robbery series.

The purpose of this report is to inform the council.

**Additional Background Information/Description of Proposal Attached**

**REQUESTED ACTION:**

**Receive Information**

**Provide Direction**

**Approve**

**REQUEST RATIONALE:**

- **Relevant Plans/Policies:**  
N/A
- **Required:**  
N/A
- **Council Request:**  
N/A
- **Other Key Facts:**  
N/A



**OUTCOMES:**

Police staff evaluate crime data from a historical and current perspective to develop crime reduction strategies.

**COMMUNITY/STAKEHOLDER OUTREACH AND INVOLVEMENT:**

- **Timeline (previous or planned):**  
N/A
- **Outreach Methods and Results:**  
N/A
- **Feedback Summary:**  
N/A

**BUDGET IMPACT:**

**Total Cost:**  
N/A

**Approved in current biennial budget:**       Yes       No       N/A

**Budget Offer Number:**  
N/A

**Budget Priority:**  
N/A

**Other budget impacts or additional costs:**       Yes       No       N/A

*If yes, explain:*  
N/A

**Funding source(s):**  
N/A

**Budget/Funding Constraints:**  
N/A

**Additional budget details attached**

**COUNCIL REVIEW:**

Date: 10/15/2024

Meeting of: Committee of the Whole - Public Safety and Human Services

File No. CM 24-484

Type: Committee Memo

**Previous Contact(s)**

Date	Meeting	Requested Action
N/A	Item has not been presented to Council	N/A

**Proposed Upcoming Contact(s)**

Date	Meeting	Requested Action
N/A	None proposed at this time	N/A

**Time Constraints:**

N/A

**ANTICIPATED RESULT IF NOT APPROVED:**

N/A

**ATTACHMENTS:**

Attachment A: RPD Police Activity Report - October 2024

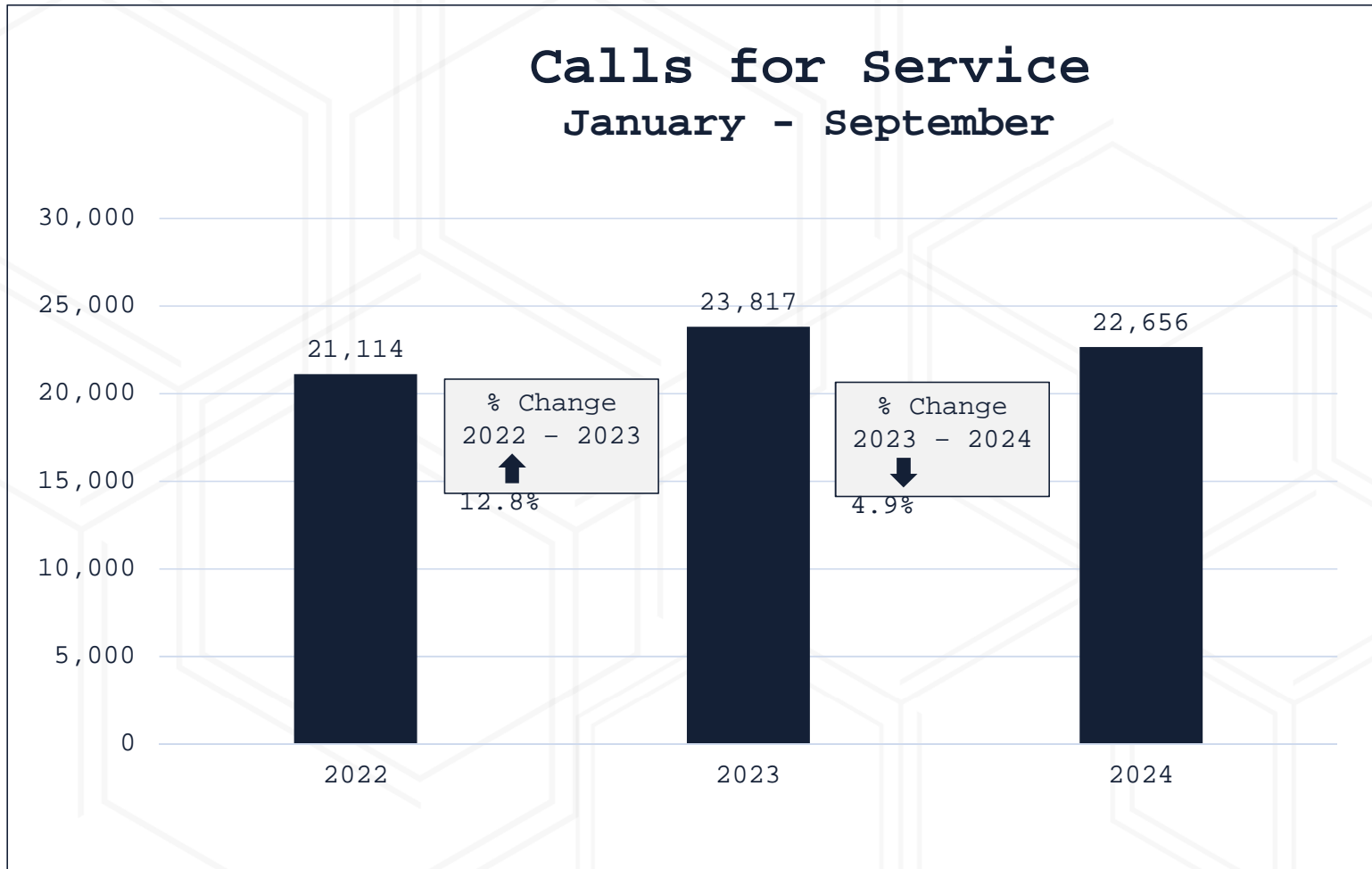
# Quarterly Police Activity Update

October 2024

Police Chief Darrell Lowe

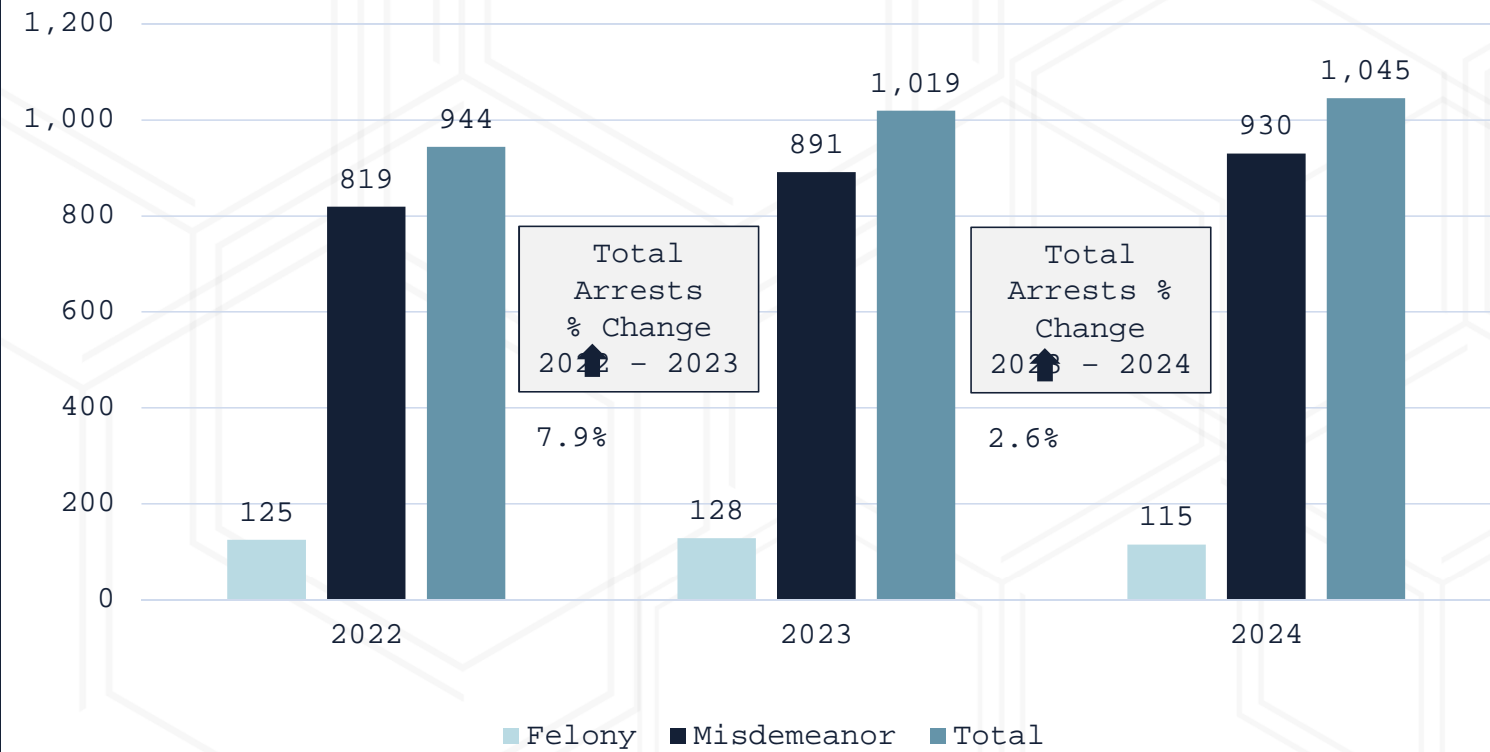


## Calls for Service January - September

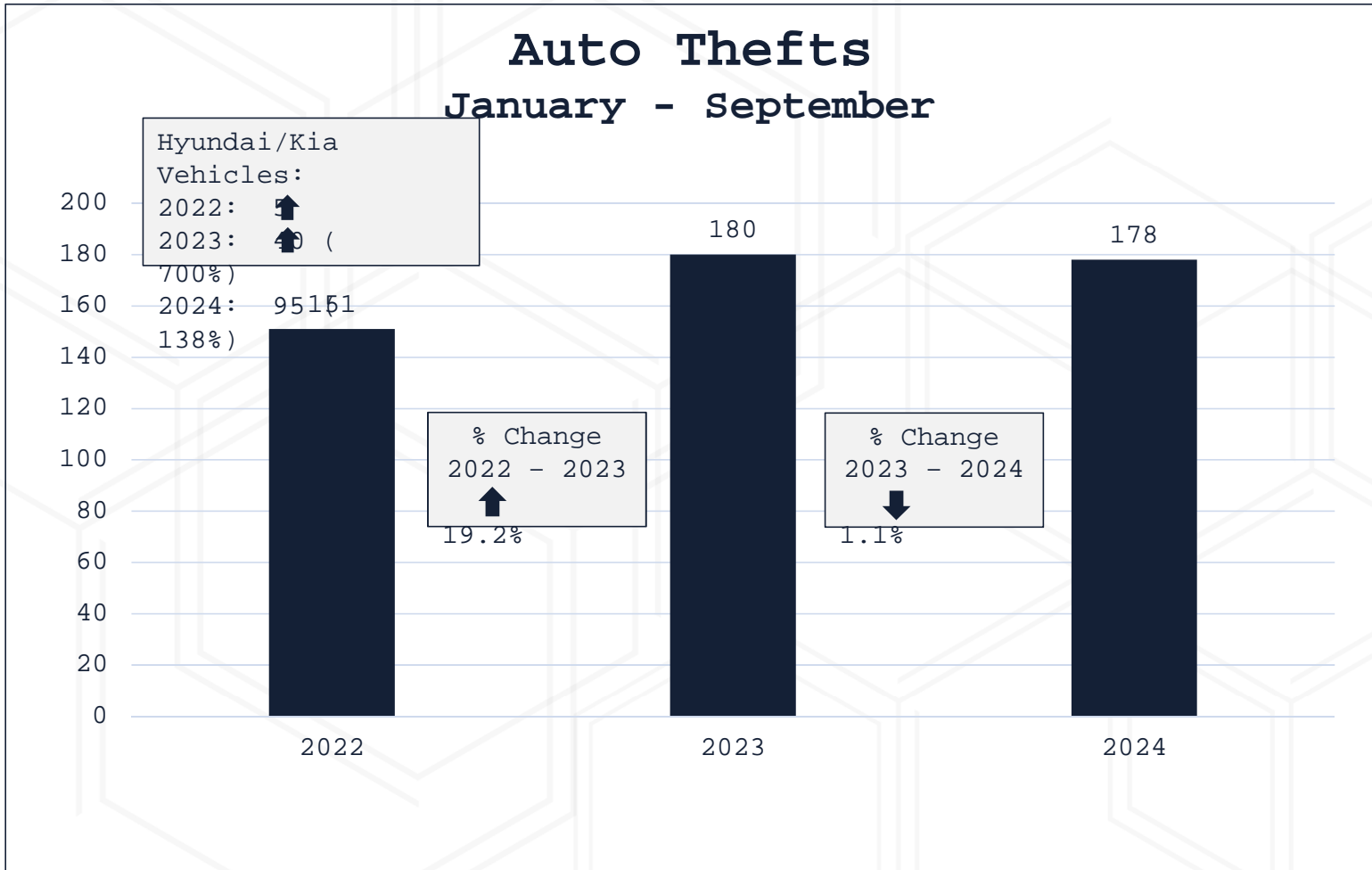


# Arrests

## January - September



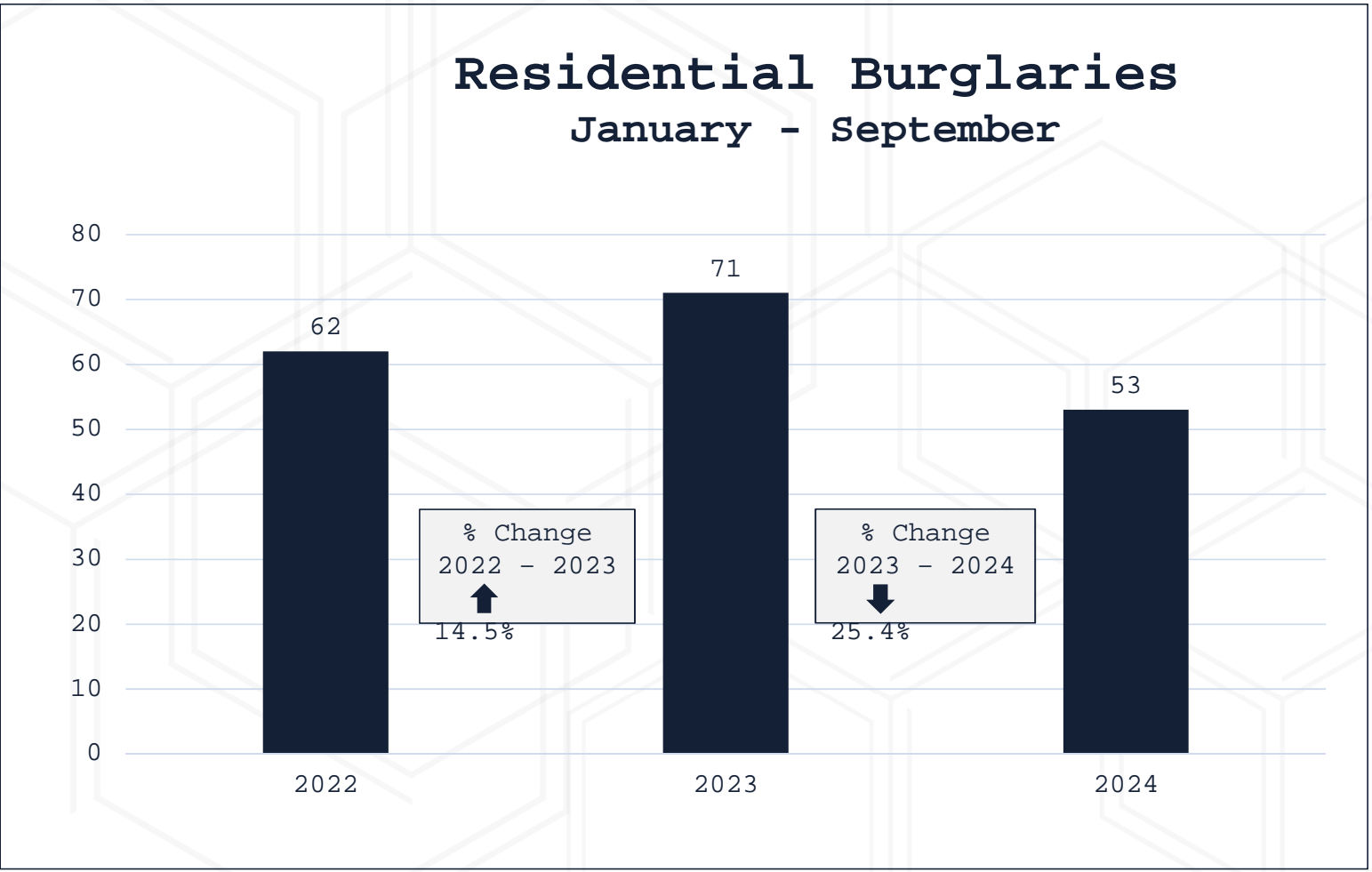
# Auto Thefts January - September



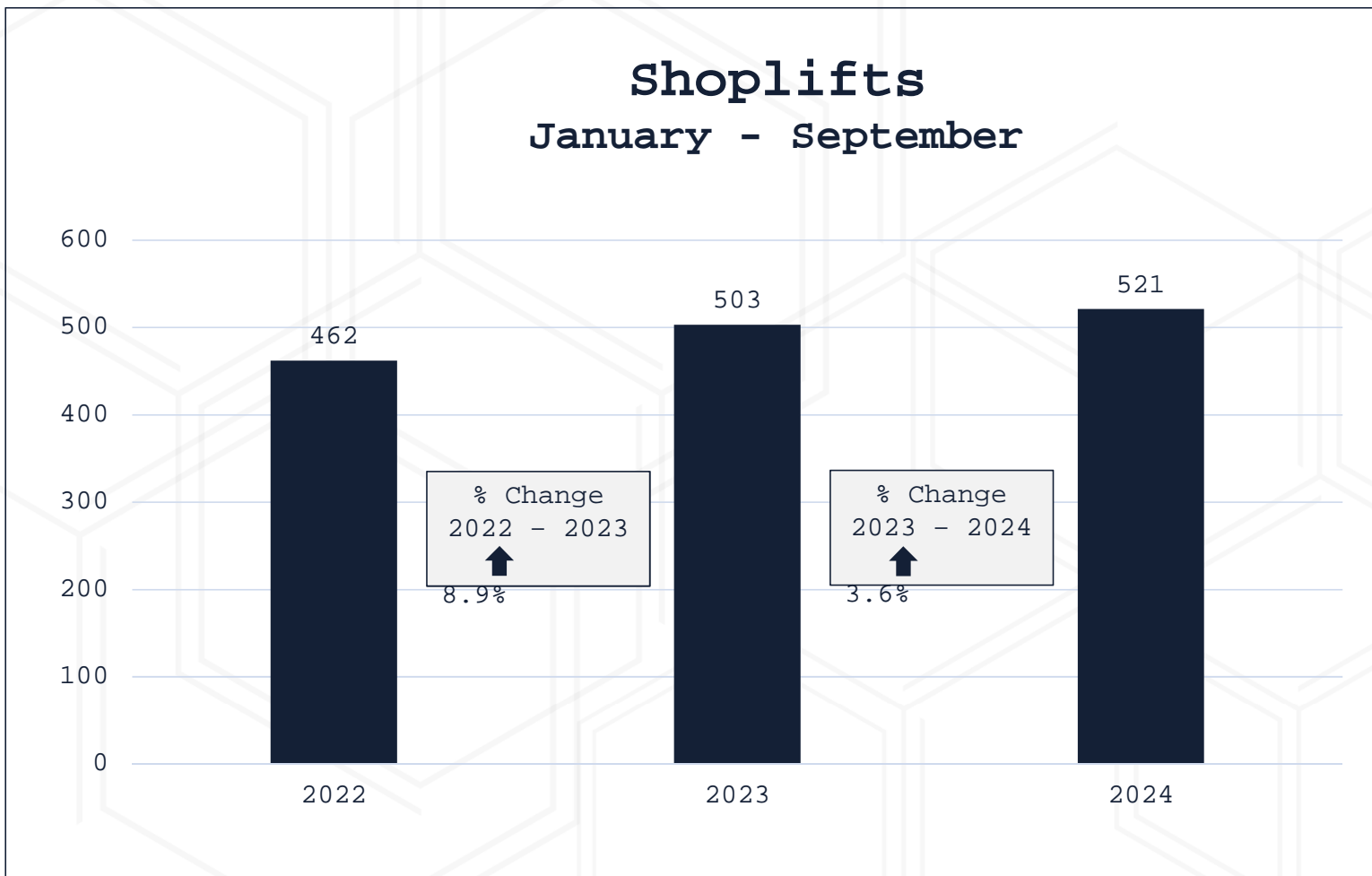
\*Counts do not include attempted auto thefts



# Residential Burglaries January - September

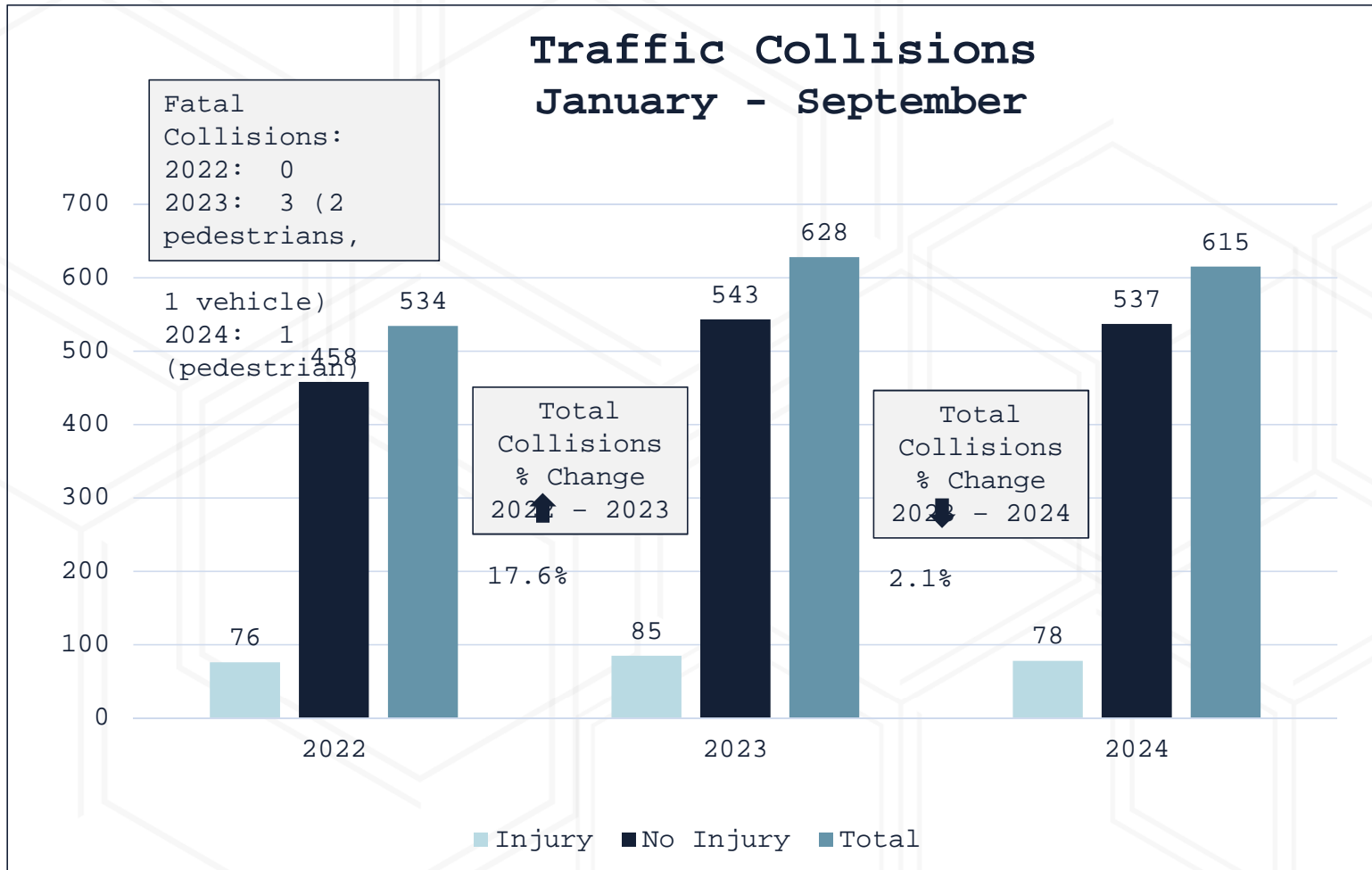


# Shoplifts January - September



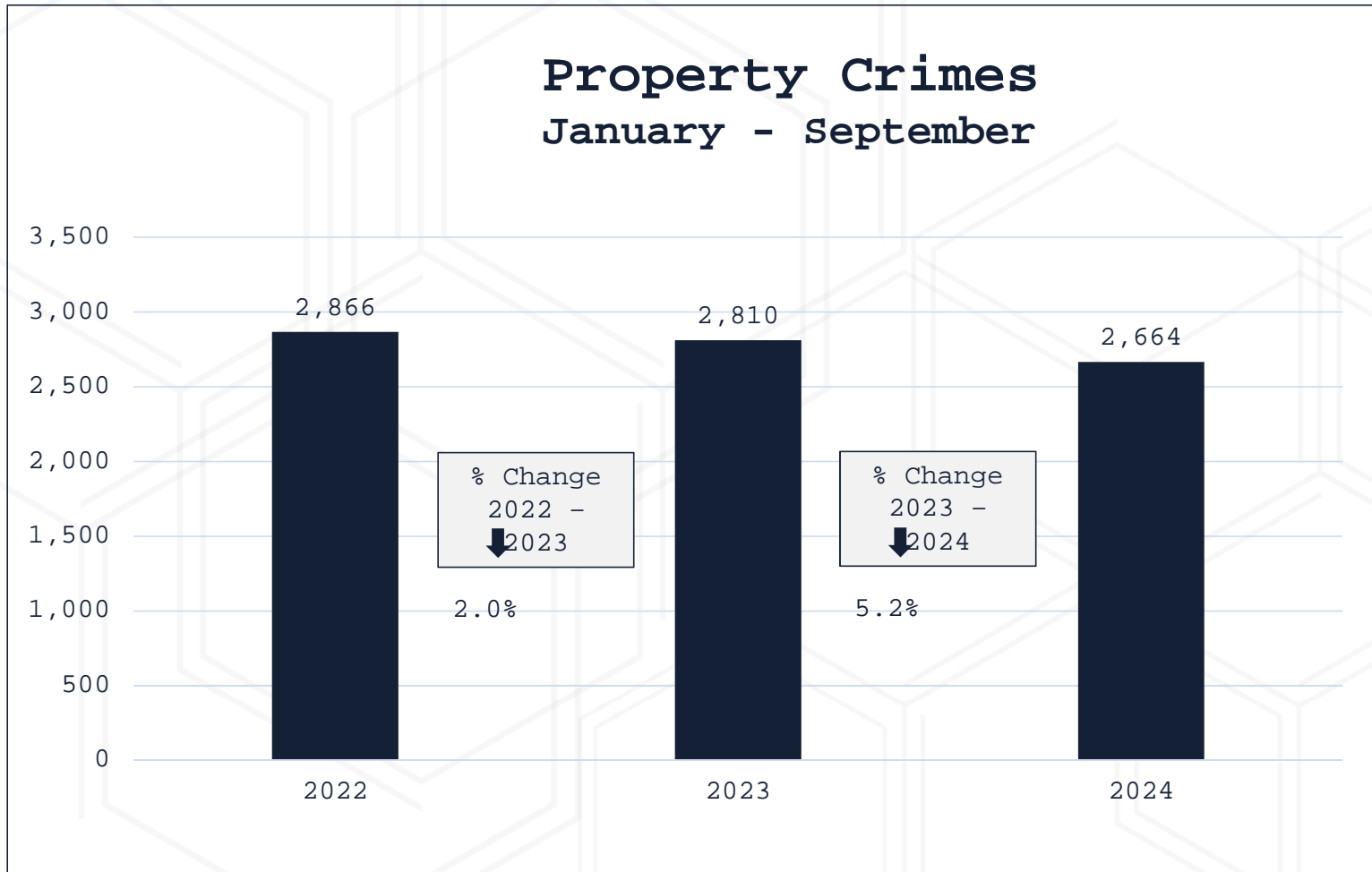


## Traffic Collisions January - September

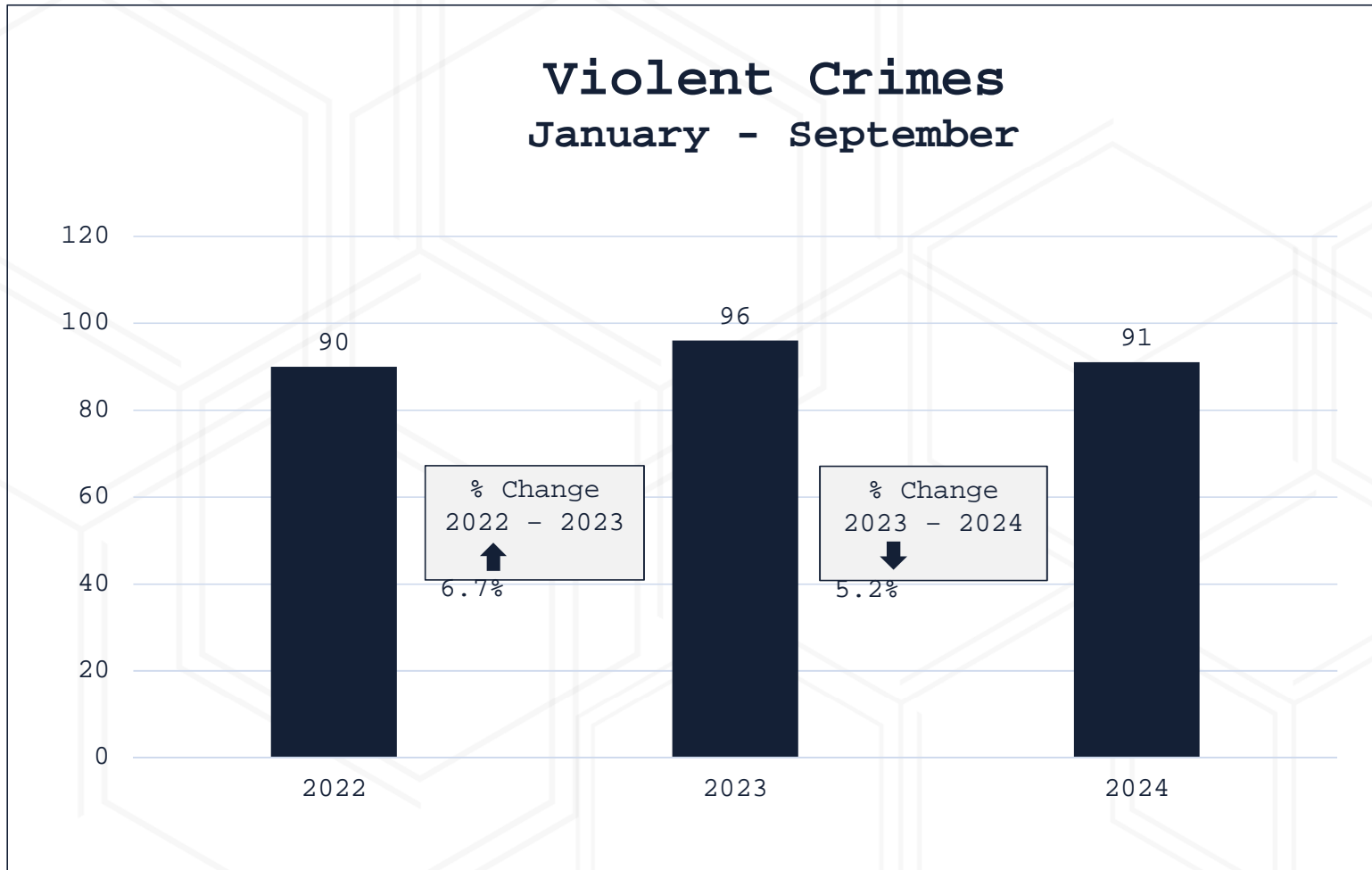




## Property Crimes January - September



## Violent Crimes January - September



\*Violent Crimes include Murder, Nonnegligent Manslaughter, Forcible Sex Offenses, Aggravated Assault and Robbery



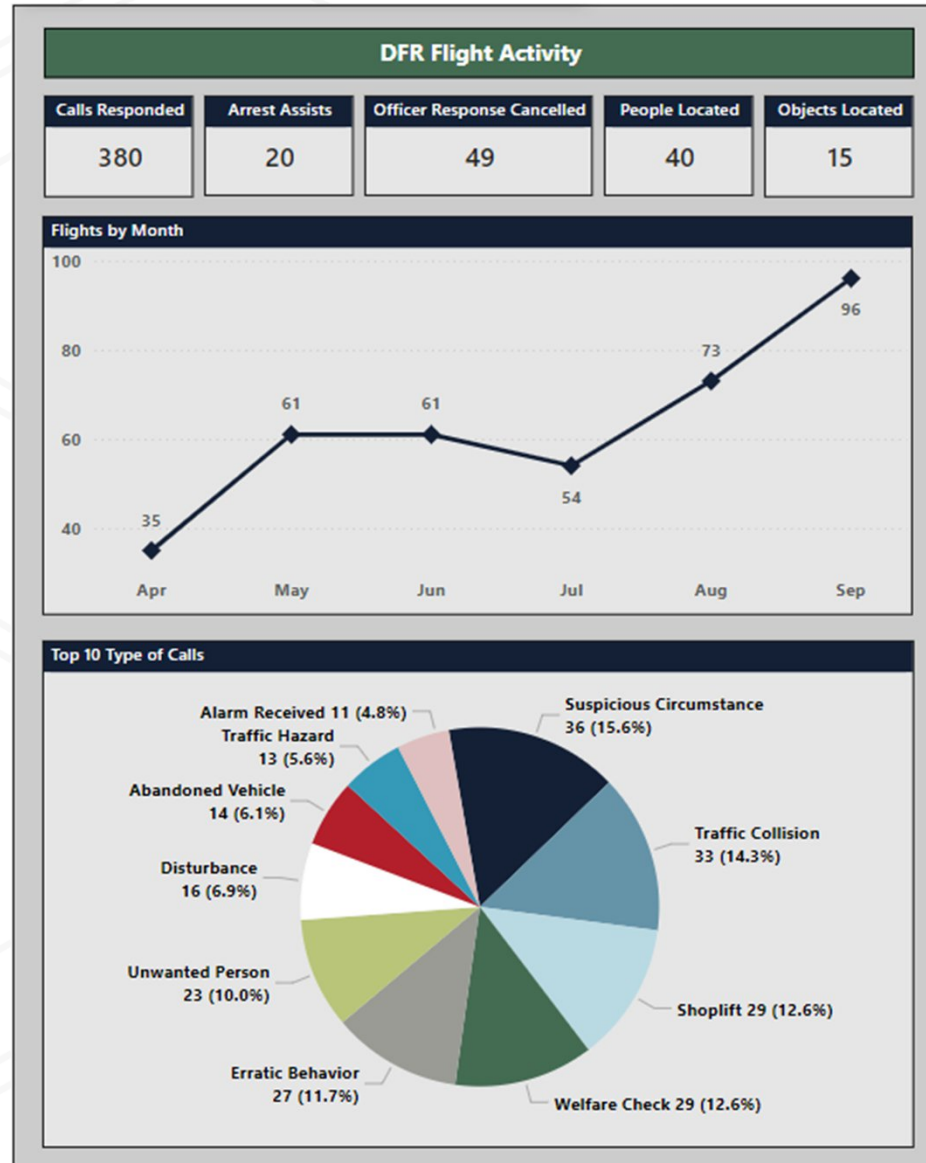
# Drone as First Responder

(DFR)

Percentage of Calls Responded

- Arrest Assists: 5%
- Officer Response Cancelled: 13%
- People Located: 11%
- Objects Located: 4%

Data collected from April 1 – September 30, 2024



# Gold Jewelry Thefts/Robbery Series

Since June, there have been 18 thefts/robberies of jewelry with similar characteristics:

- Elderly victims (often female) wearing gold jewelry and watches – usually out for a walk
- Suspects engage victims in conversation
- Remove real jewelry while placing fake jewelry on victim
- May use distraction techniques if victim is not alone
- Mostly occurring late afternoon to early evening (a few mid-morning)

Similar incidents occurring region-wide

Agencies are working together/sharing information to disrupt this series



**THANK YOU**

Any Questions?

