

EMS Vendor Billed BART \$57.6K for Unlicensed Medics and Understaffed Emergency Response Teams

BART Office of the Inspector General



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Background

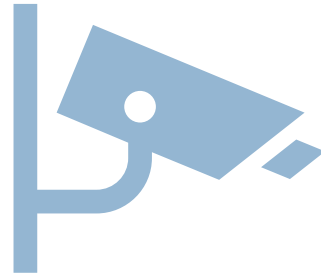
- In June 2023, BART awarded a \$598,000, two-year contract for standby basic life support services at downtown San Francisco stations.
- Contract required:
 - Two licensed EMTs on duty per shift
 - Service hours: 6–10 AM and 3–8 PM, weekdays
 - EMTs must be properly licensed and credentialed
- Contract included options to extend up to four years total.



OIG Investigation



Conducted site visits at
downtown SF BART
stations



Reviewed station
surveillance footage



Analyzed staffing rosters,
licensure documents, and
payroll records

Investigation Findings

Three unlicensed individuals staffed 189 shifts (July 2023–Dec 2024).

Seven shifts staffed by only one EMT, despite billing for two.

Vendor failed to provide all requested materials.



Vendor claimed misunderstanding of California EMT licensure requirements.

OIG confirmed BLS and EMT credentials are not equivalent.



EMT vs. BLS: Key Differences

EMERGENCY MEDICAL TECHNICIAN (EMT) PROFESSIONAL LICENSURE	BASIC LIFE SUPPORT (BLS) CERTIFICATION
170 hours of formal training + 24 hours clinical	4-5 hours CPR/AED training
Certified by CA authority	Short course certificate only
Provides pre-hospital emergency care	Limited to CPR and basic aid

Why This Investigation Matters

- Life-safety implications: unlicensed medics may endanger public health.
- Contract compliance ensures service reliability and accountability.
- Emphasizes importance of:
 - Strong vendor oversight
 - Consistent contract management
 - Enforcement of qualification standards in life-safety contracts



Relevant Law

- California False Claims Act (CFCA) prohibits knowingly submitting false claims to public agencies.
- “Knowing” includes reckless disregard or deliberate ignorance.
- Violations can lead to treble damages and civil penalties.
- Health & Safety Code §1797.80 and Title 22 §100065.05 govern EMT certification standards.



Oversight Gaps

- BART officials did not require monthly progress reports, as required by contract.
- Lack of documentation reduced oversight and allowed continued noncompliance.
- Highlights recurring gaps in service contract monitoring.



Recommendations

Recover

- Recover \$57,655 in improper payments

Seek

- Seek damages and penalties under CFCA

Terminate

- Terminate the EMS contract for noncompliance

Impose

- Impose restrictions under BART's Suspension & Debarment Policy

Reinforce

- Reinforce contract enforcement with all BART managers

Management's Response



Management will meet with contractor and issue a repayment letter to recover the \$57,655, requiring a written vendor response within 10 days.



The District will consult with General Counsel to decide whether to pursue damages and penalties under the California False Claims Act.



Transportation and Procurement will determine whether to terminate or not renew the vendor's contract and add stronger oversight terms to future agreements.



Procurement will issue a warning letter under the Suspension and Debarment Policy and work with Legal to standardize future templates.



Operations will distribute a district-wide notice reminding management staff to enforce and track contract compliance.

Settlement Reached

Contractor is to:

- Credit BART \$4,000 per month until \$57,655 until overpayment repaid.
- Notify BART Operations Control Center that two active EMT-1s have started their shift.
- Submit monthly reports confirming personnel who provided services were active EMT-1s during the billing period.

BART is to:

- Issue a warning letter in accordance with Section 28C of BART's Suspension and Debarment Policy.





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