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April 27, 2026

VIA ELECTRONIC FILING

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**RE: WellSpan EMS LLC
Application of WellSpan EMS LLC
A-2026-3061699**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission are WellSpan EMS LLC's Data Responses to Set 1 of the Public Utility Commission's Data Requests.

If you have any questions regarding the attached documents, please contact me.

Sincerely,

A handwritten signature in black ink that reads 'Victoria A. Geddis'.

Victoria Geddis
Kenneth R. Stark
MCNEES WALLACE & NURICK LLC

Cc. Angela O. Boeteng, Senior Associate General Counsel, Wellspan Health

Data Responses to Set 1 of PUC Data Requests

1. You failed to adequately answer all aspects of question #5 of the Verified Statement of Applicant. Please review Title 52 Pa. Code §29.501-509 Driver Regulations to see what is required of motor carriers.
 - a. Please explain your hiring standards for drivers; (Title 52 Pa Code §29.503-Age Restrictions)
 - i. Are there any age restrictions?
 - b. Your system for conducting criminal background checks; (Title 52 Pa Code §29.505 – Criminal History)
 - i. How often will you conduct criminal background checks for your drivers? In your application you stated that criminal background checks are required every five years. Your policy regarding the frequency of criminal background checks does not comply with the regulations found at Title 52 PA Code § 29.505(a)(2). Please provide a policy/plan that complies with the aforementioned regulation.
 - ii. What type of things in their criminal background check would disqualify a driver from employment?
 - iii. How will you maintain records (record retention) of the criminal background checks performed?
 - c. Your system for conducting driver license/history checks; (Title 52 Pa Code §29.504 – Driver History)
 - i. How often will you conduct driver license/history checks In your application you stated that driver records would be obtained prior to employment and “checked intermittently as needed, but not less than every three years.” Your policy regarding the frequency of driver license/history checks does not fully comply with the regulations found at Title 52 Pa Code §29.504(a)(2). Please provide a policy/plan for driver license/history checks that fully comply with the aforementioned regulation.
 - ii. How will you maintain records (record retention) of such checks?

Response:

The leadership of WellSpan EMS, LLC (hereinafter "WellSpan") has reviewed the PUC's regulations in Chapter 29 and will ensure compliance with those regulations.

- a) The minimum age requirement to be a driver is generally 18 and the driver will need to have requisite prior experience – at least five years serving the traveling public while operating a vehicle. The company will strictly adhere to the PUC's regulations and requirements for drivers, including age restrictions.

Pursuant to 52 Pa Code §29.503(b), a qualified driver who is under 21 years of age but over 18 years of age will be allowed to provide paratransit service provided the following conditions are met:

(1) The person shall be registered as a certified emergency medical services vehicle operator (EMSVO) with the Department of Health (Department).

(2) The person shall carry the Department-issued registration of their EMSVO certification on board while operating a paratransit vehicle under 28 Pa. Code § 1023.21(h) (relating to general rights and responsibilities).

(3) The carrier shall verify that the paratransit driver is in good standing with the Department and maintain records for 4 years to prove each person's EMSVO certificate registration. The records must be available for inspection by Commission staff upon request.

(4) The carrier shall notify the Commission's Bureau of Technical Utility Services within 3 calendar days of the occurrence of the following events involving a paratransit driver who is under 21 years of age:

- (i) an accident, regardless of the severity of the accident.
- (ii) a driving-related violation such as a moving violation.
- (iii) reckless driving.
- (iv) driving under the influence of alcohol or drugs.

- b) Consistent with 52 Pa Code § 29.505(a)(2), WellSpan EMS, LLC will ensure that it conducts criminal background checks every two years.

In compliance with 52 Pa Code § 29.505(a)(3), the company will not hire or utilize any drivers convicted of a felony or misdemeanor under the laws of the Commonwealth of Pennsylvania or another jurisdiction, to the extent the conviction relates adversely to that person's suitability to provide service safely and legally. WellSpan has a process in place

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WellSpan EMS LLC

for the review of all records of concern (including criminal charges / convictions) that is utilized during the hiring process as well as for any clearance / criminal screening renewals. Factors considered include recency, relevancy, nature of the conviction, etc. For a driver, records of concern that would escalate may including driving offenses (DUIs, etc). Additionally, the majority of our team members also require child abuse clearances. If the driver requires child abuse clearances, then any conviction disqualifying a team member to be employed under PA's Child Protective Services Law would also be a disqualifier - examples include certain violent crimes, crimes against children, certain severe drug offenses, etc. These are examples and are not intended to be all-inclusive.

Further, per 52 Pa Code § 29.505(a)(4), WellSpan EMS, LLC will retain copies of the criminal history checks for at least three years.

- c) Consistent with 52 Pa Code §29.504(a)(2), WellSpan EMS, LLC will obtain a driving history for each driver at least once every 12 months from the date of the last report. Additionally, a copy of the driver history shall be maintained by WellSpan for at least two years consistent with 52 Pa Code §29.504(a)(3).

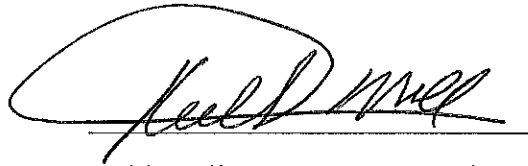
Response Provided by: Keith Noll

Date: April 27, 2026

VERIFICATION

I, Keith Noll, state that I am the Senior Vice President of Corporate Shared Services at Wellspan Health (the "Company"); that I am authorized to make this Verification on behalf of the Company; that I have read and assisted in preparing the foregoing discovery responses; that any statements in the foregoing responses with respect to the Company, except as otherwise specifically attributed, are true and correct to the best of my knowledge, information, and belief; and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 4/27/26

A handwritten signature in black ink, appearing to read "Keith Noll", written over a horizontal line.

Keith Noll, SVP, Corporate Shared Services