



National Association of State EMS Officials

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August 19, 2015

Drew Dawson
Director, Office of Emergency Medical Services
National Highway Traffic Safety Administration
1200 New Jersey Ave. SE
Washington, D.C. 20590

Dear Mr. Dawson:

You will recall during your attendance at the National Association of State Emergency Medical Services Officials (NASEMSO) 2014 Fall Meeting, our members communicated concerns about their experiences trying to operationalize the recommendations in the 2012 "Working Group Best-Practice Recommendations for the Safe Transportation of Children in Emergency Ground Ambulances" ("2012 Recommendations"). In addition to focused discussion about the challenges state regulatory authorities are facing, we asked for your assistance to address these unresolved matters on a NHTSA-wide basis.

We estimate that there are nearly 67,000 ground transport ambulances in the United States. Gaps, issues and challenges with the 2012 Recommendations are very troubling--the most pressing being that there is no national design specification and no crash standard available specific to pediatric restraints for use on an adult sized cot or for child safety seats used in the patient compartment of ground ambulances.

The concern of NASEMSO membership led to the passage of a resolution at the NASEMSO 2014 Fall Meeting (attached). Thank you for your consideration of this transmission and its contents.

Late last week the NASEMSO Board of Directors voted to establish an Ad Hoc Committee focused exclusively on this matter. Our observations, escalating since our Fall Meeting, are that chief administrative officials of local EMS agencies and state EMS regulators are being placed in the inconceivable position of disregarding the 2012 Recommendations.

EMS personnel continue to transport children either on an adult's lap, by using conventional FMVSS213-compliant child safety seats in side or rear facing seats often found in an ambulance, or by restraining them on a cot designed for adults either by using the provided adult cot restraints or by an alternative restraint device that is not required to meet any design or crash standards.

Of all vehicles on the nation's roadways, the back of an ambulance should be the *safest* place for an infant or child to be transported.

We would appreciate NHTSA's action to address the issue from both a behavioral perspective and from a potential regulatory perspective. NASEMSO stands ready to assist you as appropriate.

Sincerely,

Paul R. Patrick
President
National Association of State EMS Officials



**Support for Ambulance and Equipment Crash-Testing
Standards and Related Safe Transport
Recommendations for Children in Ground Ambulances**

Whereas, children being transported in ground ambulances require restraint and/or immobilization equipment and methodology appropriate to their specific anatomical and physiological needs; and

Whereas state emergency medical services (EMS) officials are responsible for regulating equipment requirements for ground ambulances and for guiding services in adopting related safety practices in their respective states; and

Whereas state EMS officials seek evidence-based standards and national recommendations upon which to base regulations and guidance for services in this area; and

Whereas there are no such recognized standards for the appropriate sled and/or crash testing of ambulances and ambulance equipment (such as stretchers, adult and pediatric restraint/immobilization equipment), leaving the evaluation of equipment and techniques for the proper restraint/immobilization of children largely without sufficient scientific basis in the United States;

Whereas in this absence of such evidence-based standards, attempts have been made to provide expert panel-based national recommendations, such as the 2012 National Highway Traffic Safety Administration (NHTSA) document *Safe Transport of Children in Emergency Ground Ambulances*, which have been found by some state EMS offices to be difficult to employ in guiding services to improve child-safe transport practices and equipment; and

Whereas NASEMSO enjoys a beneficial relationship with NHTSA and numerous other federal partners and national organizations, which fund or otherwise encourage research and development leading to evidence-based EMS standards;

Now therefore let it be resolved that the National Association of State Emergency Medical Services Officials (NASEMSO) urges its federal and national organization partners to apply their resources to accelerate research and development of evidence-based standards upon which national EMS organizations, state EMS offices, EMS agencies and others can base recommendations for child-safe transport practices and equipment in ground ambulances; and

Be it further resolved that NASEMSO requests the National Highway Traffic Safety Administration to join NASEMSO in reviewing the *Safe Transport of Children in Emergency Ground Ambulances* document to better enable state EMS officials and others to employ it in guiding EMS agencies to improve their child-safe transport practices and equipment.

Submitted by David Edwards (VA) on behalf of the Pediatric Emergency Care Council.

Signed this 9th day of October 2014.



James DeTienne
2012-2014 President



Dennis Blair
2012-2014 Secretary

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