



## **National Association of State EMS Officials**

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Centers for Medicare and Medicaid Services  
Department of Health and Human Services  
CMS-3178-P  
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On behalf of the National Association of State Emergency Medical Services Officials (NASEMSO) I would like to thank the Centers for Medicare and Medicaid Services (CMS) for the opportunity to provide comments on proposed emergency preparedness requirements for Medicare and Medicaid participating providers and suppliers. The National Association of State EMS Officials is the lead national organization for EMS, a respected voice for national EMS policy with comprehensive concern and commitment for the development of effective, integrated, community-based, universal and consistent EMS systems. Our membership includes 56 state and territorial EMS directors, state medical directors, state education and training managers, state data manager and trauma managers, EMS for Children managers plus corporate and associate members.

History has shown us that there is little to no advance notice of natural or man-made disasters. Based on this fact the NASEMSO supports the proposed planning and testing requirement for Medicare and Medicaid participating providers and suppliers. NASEMSO membership believes that this requirement will support emergency responder's response to these types of situations and ensure a safer environment for patients receiving emergency services by participating providers. Although, there may be some providers that perceive this as a hardship, the overall benefit to the patient, their families and to emergency services providers outweighs any hardship that may be recognized.

NASEMSO membership strongly supports the recommendation that this planning and testing must be conducted in coordination with federal, state, tribal, regional, and local emergency preparedness partners not only in the rural setting but by all health care providers and suppliers. This requirement for all health care providers and suppliers will ensure a satisfactory response and recovery for the patient, community and emergency providers from any disaster. NASEMSO membership would like these plans in place within 2 years but we do believe that this timeline would put a hardship on some providers. Our recommendation would be that each Medicare and Medicaid participating providers and suppliers at least provide evidence of starting the process of developing a real response and tested disaster plan to include correspondence with all local EMS agencies whose services may be requested in the event of the need for an evacuation of the facility to advise about the planning by the end of the 2<sup>nd</sup> year of this requirement. NASEMSO membership also believes that it is possible for each Medicare and

Medicaid participating providers and suppliers to be able to complete and fully test their disaster plan at least once by the end of year 5.

As this process continues allow me to offer the NASEMSO organization our assistances to the Centers for Medicare and Medicaid Services in this valuable endeavor. This project will ensure a safer future for patient and emergency services provider when responding and managing natural or man-made disasters.

Please let me know if you have any comments or questions.

Sincerely,

James DeTienne  
NASEMSO President, 2012-2014

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