



National Association of State EMS Officials

201 Park Washington Court Falls Church, VA 22046-4527 www.nasemso.org
703-538-1799 fax 703-241-5603 info@nasemso.org

Ken Holland FF/NREMT-P, BA, MBA/PA
National Fire Protection Association
Senior Emergency Services Specialist
Public Fire Protection
1 Batterymarch Park
Quincy, Ma.

Dear Ken,

Thank you for the opportunity to comment on the proposed project “Fire Based Community Healthcare Provider Program”.

While this proposal seeks the development of a “guide” for community paramedicine (CP) development within fire-based EMS programs, further description of the project in the call for public comment describes development of a “stand-alone standards guide”. Without clarity to the purpose of this project, we are responding on two levels:

NASEMSO commented about a similar NFPA proposal in 2012 and our concerns about standards development for CP are still pertinent. If standards development for CP is indeed the intention, then it is still premature for such a document. Community paramedicine programs are intended to address gaps in community health care and are, therefore, very local solutions in their nature. This characteristic defies standardization in the sense generally considered in NFPA standards development.

As an example, performance measures for CP would seem to be one area that a standards-setting approach would consider. However, a recent national effort to catalog and define such measures was of great concern to CP providers. Such standards imposed without flexibility for the inherently customized local nature of these programs may limit opportunities for programs to meet local needs. While virtually everyone agrees that measures need to be defined, indiscriminate application of standardized sets of measures to any given CP provider may not work for another whose meet a different need.

The proposal states that the fire-based nature of CP makes it a unique initiative, different from non-fire based efforts, however it doesn’t really establish this. If standards development is not the intention and this is envisioned as a resource document to guide CP development based upon a fire setting, then this may be a worthwhile NFPA project. Such a project will entail significant time, people and financial resources. It contemplates partnerships from numerous organizations and stakeholders in the industry.

However, other similar approaches among the same stakeholders are already being implemented. Even if NFPA desires to create a fire-based guide, we would invite NFPA's efforts to be carried out within the context of these initiatives rather than engaging the same people on parallel projects. As the proposal states, there are a number of efforts such as a Joint National EMS Leadership Forum community paramedicine-mobile integrated healthcare toolkit project and an emerging National EMS Advisory Council initiative that may very well provide guidance NFPA needs for their document. Please consider in your decision the best use of limited resources for your needs.

Again, thank you for the opportunity to comment on this proposed project.



Jim DeTienne, Chair
Community Paramedicine-Mobile Integrated Healthcare Committee
National Association of State EMS Officials