

NASEMSO Comments on Proposed Collection of Information by NHTSA of Ambulance Driver Training Requirements

DOT Docket ID Number: NHTSA-2014-0127

Docket Name: Characterizing Ambulance Driver Training in EMS Systems

In response to the Request for Comments published in [Federal Register Notice](#), the **National Association of State EMS Officials** (NASEMSO) submits responses to the following questions:

- (i) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;

NASEMSO Comments: NASEMSO believes that understanding existing training requirements for those who drive ambulances is a critically important role for NHTSA. Not only does NHTSA have responsibility for highway traffic safety, but its office of Emergency Medical Services (EMS) serves as the lead federal agency responsible for developing educational and training standards for EMS personnel. In addition to setting training standards, NHTSA has studied research in the field of ambulance crashes. The collection of ambulance training requirements throughout the nation would serve to further an effort to reduce the number and severity of ambulance crashes. The information collected will have practical utility because it will enable NHTSA to more accurately determine the state of the existing training and what may be necessary to address deficiencies that contribute to crashes. In 1995, NHTSA revised its Emergency Vehicle Operators Course (EVOC) curriculum for ambulances – a curriculum that is overdue for an update given the changes in the field in the last 20 years. For example, the amount of new technology now in the driver’s compartment of the ambulance creates additional opportunities for distractions for the driver.

- (ii) The accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;

NASEMSO Comments: Regarding NHTSA’s estimate of the burden of the proposed collection of information, NASEMSO notes that the proposal to contact up to 21,283 EMS agencies across the United States to conduct an internet-based survey does not specify how the numerous EMS agencies are to be contacted. If the agency intends to contact the EMS agencies through electronic mail, there will likely be difficulties in obtaining email addresses. The most obvious source of the information would be state EMS offices because they license EMS agencies. However, some state EMS offices are prohibited from sharing email addresses of EMS agencies. Would the state EMS office then be requested to contact the EMS agencies in their respective states? NASEMSO has attempted to collect contact information for all EMS agencies, but has found the task to be more difficult than

expected and has thus far been unsuccessful in compiling complete and accurate data from all the states and territories.

With regard to the time estimate for completing the internet surveys (30 minutes each) and semi-structured interviews of state officials (1 hour each), NASEMSO believes that the time estimate may be slightly high. It is likely these tasks will not require as much time as estimated. NASEMSO appreciates NHTSA's willingness to over estimate the burden rather than minimizing it.

(iii) How to enhance the quality, utility, and clarity of the information to be collected;

NASEMSO Comments: NASEMSO believes that the success of any survey is largely dependent on **brevity** and **clarity**. The number of questions should be limited to only those that are essential for obtaining the information desired. Each question must be written in clear, unambiguous language. Terms used in questions that could evoke different understandings should be defined and clarified. If any questions require the respondent to know information not readily on hand, electronic links should be embedded in the survey tool.

(iv) How to minimize the burden of the collection of information on those who are to respond, including the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, *e.g.*, permitting electronic submission of responses.

NASEMSO Comments: NASEMSO agrees with the agency's proposed methodology of collecting the information through an internet-based survey. There are internet-based survey tools that simplify the collection of the information for both the survey recipient and the collector of the information. The key to minimizing the burden on those who are to respond will be to limit the number of questions asked. It is likewise important to ensure respondents have ready access to any information necessary to accurately respond, by embedding electronic links to reference material.

Lastly, NASEMSO requests the opportunity to review the survey questions before they are finalized and distributed. NASEMSO believes its EMS experience will help to ensure the survey focuses on key elements of ambulance driver training. NASEMSO appreciates the opportunity to provide comments on this important effort.

Submitted by Paul Patrick, President, NASEMSO
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