Dear

Thank you very much for the opportunity to provide comment to the *"Proposed Annotated Commission on Accreditation of Allied Health Education Programs (CAAHEP) Standards for the EMS Professions"* distributed by the Committee for the Accreditation of Educational Programs in the Emergency Medical Services Profession (CoAEMSP). The National Association of State EMS Officials (NASEMSO) has submitted our formal comments via the requested form. We have also attached a copy of the comments to this letter for your convenience and review. NASEMSO appreciates the work of CoAEMSP's Standards Committee and Board to provide this draft and we commend the efforts of all those involved. National EMS Program Accreditation at the paramedic level has become recognized as an important adjunct to the state licensure process and the standards revision process provides an opportunity to improve issues identified since the statewide implementation of EMS program accreditation in 2013.

While a few of our comments may be perceived as editorial in nature, we feel there are areas that need to be specifically addressed in the standards document before NASEMSO would be able to formally endorse them. Of primary concern is the blending of paramedic and Advanced Emergency Medical Technician (AEMT) standards into a single standards document. NASEMSO believes that while the standards may be largely redundant, the development of AEMT standards would require a separate and distinct process if the EMS community wants or expects states to adopt them. NASEMSO understands that current data suggests that states are not ready to proceed with a requirement for AEMT program accreditation and that this lack of firm commitment may impact the decision to proceed with AEMT program review and accreditation, however, this process cannot be rushed merely because the CAAHEP standards revision process is subject to a five-year cycle. While the review of an AEMT program might be conducted concurrently, the CoAEMSP must ensure that appropriate and adequate resources are available to candidates at both levels.

Another opportunity that the revision process provides is the ability to include greater specificity in qualifications for program medical directors and assistant medical directors.   As written in the proposed version, the document states "be a physician currently licensed and authorized to practice in the location of the program." NASEMSO believes that CAAHEP standards should require that physicians involved in the education or oversight of EMS practitioners possess an "unrestricted license to practice medicine" in order to function in this role. This requirement would provide an assurance that applicants are in compliance with federal and state regulatory requirements and not subject to disciplinary procedures or limitations in the ability to supervise, teach, or practice medicine.

Finally, Dr. George Hatch suggested to our membership in October that many of the comments received can be integrated into the CoAEMSP Standards Interpretation

document. It has been brought to NASEMSO's attention that a "Final Proposed Standard" is not anticipated following the comment period. If the CoAEMSP anticipated that comments from the stakeholder review would not be incorporated into the annotated standards, then stakeholder organizations should have been asked for an endorsement of the standards "as published" rather than invite comments and not incorporate them into a final version. NASEMSO is unable to provide a formal endorsement of the (annotated) proposed standards until the CoAEMSP demonstrates that it reviewed and considered all stakeholder comments and incorporated appropriate recommendations into final proposed standards following the comment period. NASEMSO would gladly consider a revised final document for endorsement and would do so in a timely manner.

Thank you again for the partnership and please let me know if you have any questions in this regard.

Sincerely,

Paul Patrick
President

Cc
Dr. George Hatch
Severo Rodriguez
Donna Tidwell
Randy Kuykendall