



## National Association of State EMS Officials

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August 19, 2015

Drew Dawson  
Director, NHTSA Office of EMS  
1200 New Jersey Avenue S.E.  
Washington, DC 20590

Dear Mr. Dawson:

You will recall during your attendance at the National Association of State Emergency Medical Services Officials (NASEMSO) Fall Meeting, which included a meeting of the NASEMSO Pediatric Emergency Care Council (PECC), our members communicated their concerns about their experiences trying to operationalize the recommendations in "Transporting Children Safely in Ground Ambulances Guidelines" ("Guidelines") published by NHTSA in 2012. In addition to focused discussion about the challenges state regulatory authorities are facing, we asked for your assistance working on 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 Guidelines are very troubling – the most pressing being that there is no national design or crash standard available specific to pediatric restraints for use for a patient lying flat or semi-recumbent on an adult-sized litter or of car seats intended to be used in ground ambulances, or by purchasers or regulators and inspectors of those devices.

The combined concern of the state EMS directors, the PECC members, the NASEMSO Ambulance Vehicle and Licensure Committee and the NASEMSO Highway Incident and Transportation Systems Committee led to the passage of a resolution at the NASEMSO 2014 Fall Meeting. It is 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 the Fall meeting are that chief administrative officials of local EMS agencies and state EMS regulators are being placed in the impossible position of deciding to disregard the Guidelines, use a conventional child seat in a manner that has no assurance of safety as a result of FMVSS213 compliance due to its orientation, place a child laying down in a restraint for which no design or crash standard exists in the US, or worst of all, placing an infant or child in a safety seat in the front passenger seat of the cab of the ambulance or manually holding the child on an adult's lap.

Of all possible vehicle types on the nation's roadways, the back of an ambulance rolling towards a hospital should be the *safest* place for an infant or child to be transported.

We would welcome an opportunity to collaboratively develop an action plan to address this critical issue.

Sincerely,

A handwritten signature in black ink that reads "Paul R. Patrick". The signature is written in a cursive style with a large initial "P" and "R".

Paul Patrick  
President, NASEMSO