



National Fire Protection Association

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Christian Dubay, P.E.
Vice President and Chief Engineer

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Sarah L. McEntee
Executive Director
Commission on Accreditation of Ambulance Services
1926 Waukegan Road, Suite 300
Glenview, Illinois 60025-1770

Dear Ms. McEntee:

We recently learned that Commission on Accreditation of Ambulance Services (CAAS) is seeking to develop a ground ambulance vehicle standard. As you are aware, the National Fire Protection Association (NFPA) publishes and maintains an ambulance vehicle standard, NFPA 1917, first issued in August, 2012. In light of your stated intention to develop a separate, redundant ambulance standard, we wish to notify you that NFPA 1917 is currently under revision and the Technical Committee will be seeking Public Comment on the First Draft starting March 7, 2014. For the reasons provided in this letter, we invite, and urge, CAAS members to provide Public Comment and help shape the revised edition of NFPA 1917. In addition, though a matter of lower priority, we would like to address several of the statements made in the summary document of CAAS' ambulance vehicle standard proposal. These statements are misleading and could create the misconception that NFPA failed to adhere to voluntary consensus standards principles and that the NFPA 1917 Technical Committee members failed to produce a quality technical standard that meets stakeholder needs. Either impression is entirely false.

NFPA is an American National Standards Institute (ANSI) accredited, voluntary consensus standards body with a deep and credible history of involvement with the first responder community. Under the National Technology Transfer and Advancement Act (NTTAA) and OMB Circular A119, federal agencies must adopt voluntary consensus standards wherever possible.¹ Voluntary consensus standards are those developed in accordance with the criteria established in OMB A119 § 3(f): openness; balance of representation; due process; the availability of an appeals process; and consensus. In following these core principles, NFPA strictly adheres to the ANSI Essential

¹ The recently published draft revision to OMB A119 reemphasizes this preference (see pg. 20).
<http://www.whitehouse.gov/sites/default/files/omb/inforeg/revisions-to-a-119-for-public-comments.pdf>

Requirements, and thus all NFPA standards, including NFPA 1917, are ANSI approved voluntary consensus standards. The 2013 edition of NFPA 1917 was approved as an American National Standard on August 29, 2012. Because of this, we feel confident NFPA 1917 will meet the needs of the General Service's Administration, as it phases out the federal one star KKK specification, and in turn, meet the needs of states and other users.

In keeping with NFPA's commitment to both openness and the development of quality technical standards, the NFPA 1917 Technical Committee represents a broad range of stakeholder interests and expertise in the ambulance vehicle engineering and emergency medical fields. In fact, the Committee includes representatives from most of the organizations CAAS seeks to have join its standards project. These include: representatives from the American Ambulance Association, National Association of State EMS Officials, National Association of Emergency Medical Technicians, the National Emergency Medical Services Management Association, the International Association of Fire Chiefs, the National Volunteer Fire Council, as well as representatives from GSA, the National Institute of Occupational Safety and Health, and the Department of Homeland Security. These representatives have been active participants in the development of the standard. Furthermore, the CEO and Chairman of the Board of CAAS, Mr. Mark Meijer, serves on the NFPA 1917 Technical Committee.

Pursuant to the NFPA requirements on committee balance, the NFPA 1917 Technical Committee is structured to ensure no one interest can dominate the consensus building process. However, we would strongly urge representatives of interests that CAAS feels are missing from the NFPA process to apply for membership to the Technical Committee, or to at least provide Public Comment to the Technical Committee as it considers the next edition of NFPA 1917. Public Comments and technical committee applications can be submitted electronically at www.nfpa.org.

It should be noted that the NFPA process has proven to be responsive in meeting the needs of the first responder ambulance community. Last summer, the NFPA 1917 Technical Committee initiated two tentative interim amendments (TIA) that addressed several concerns raised with the first edition of NFPA 1917 without having to wait until 2015 for the next edition. Because NFPA's ANSI-accredited process has a proven track record of meeting user needs, we would again urge you to work within the NFPA system instead of launching a competing and duplicative project. All participants will save precious personnel and travel resources by focusing on NFPA's well-established consensus standards process rather than embarking on a new initiative.

Finally, we would like to address any false impression created by documents circulated by CAAS on the need for a new ambulance vehicle standard. In that document you note, "Although the NFPA process was *originally* based on consensus building . . . , the final product has not proven to be a universally acceptable national [ambulance standards] . . ." [emphasis added]. As described above, NFPA strictly follows an ANSI-accredited voluntary consensus standards development process. The development of 1917 did not deviate from that process. Therefore, any suggestion that the original consensus process was not used throughout is false. CAAS documents also attribute the lack of state level adoption of 1917 to " . . . the inability of NFPA to address concerns in regard to safety, efficiency, and technology to the broad spectrum of the EMS community." As you are likely aware, many states do not even formally adopt the federal KKK specification. The fact that states have not yet acted on NFPA 1917 in the 18 months it has been available, likely speaks much more to the

deliberative nature of government than to defects in the standard, as your language suggests. The NFPA 1917 Technical Committee is composed of knowledgeable experts that reviewed and incorporated much of the same research and material CAAS proposes a new project committee use. We wanted to take this opportunity to dispel any impressions that these committee members were unable to sufficiently address “safety, efficiency, and technology [for] a broad spectrum of the EMS community.”

NFPA is deeply committed to the safety of America’s first responder community and to developing the best possible ambulance vehicle standard. We again urge CAAS to reconsider its decision to start a duplicative project and invite your members to be active in the NFPA process. I am happy to discuss further any of the issues presented in this letter.

Sincerely,



Christian Dubay, P.E.
Vice President & Chief Engineer

c: American Ambulance Association (AAA) - Mark Meijer
American College of Emergency Physicians (ACEP) - Dr. Alexander Rosenau
Ambulance Manufacturers Division (AMD) – Paul Holzapfel
Association of Air Medical Services (AAMS) – Rick Sherlock
Congressional Fire Services Institute (CFSI) – Sean Carroll
Department of Homeland Security (DHS) - Richard Patrick
General Services Administration (GSA) – John McDonald
Health and Human Services (HHS)
International Association of Fire Chiefs (IAFC) – Mark Light
International Association of Fire Fighters (IAFF) – Lori Moore, Jonathan Moore
Metro Chiefs – Russ Sanders/NFPA
National Association of Emergency Medical Services Physicians (NAEMSP) - Jerrie Lynn Kind
National Association of Emergency Medical Technicians (NAEMT) – Don Lundy
National Association of State EMS Officials (NASEMSO) – Dia Gainor
National Emergency Medical Services Management Association (NEMSMA) – Troy Hagen
National Highway Traffic Safety Administration (NHTSA) – Drew Dawson
National Institute for Occupational Safety and Health (NIOSH) – Jim Green
National Institute of Standards and Technology (NIST) – Jennifer Marshall
National Truck Equipment Association (NTEA) – Steve Spata
National Volunteer Fire Council (NVFC) – Dave Finger
NFPA 1917 Technical Committee Chair – Dave Fischler
Transportation Research Board (TRB) -