



National Association of State EMS Officials
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Comments of the National Association of State Emergency Medical Services Officials
to the National Highway Traffic Safety Administration

on

Docket No. NHTSA 2014-0014
NHTSA 2014-2018 Strategic Plan
February 24, 2014

The National Association of State Emergency Medical Services Officials (NASEMSO) respectfully submits these comments in response to the notice and request for comment published by the National Highway Traffic Safety Administration (NHTSA) in this docket: 79 Federal Register 6671 et seq. (February 4, 2014).

States established their authority to develop and regulate emergency medical services (EMS) systems beginning in the early 1970s. Each state and territory in the United States has a lead EMS agency. These agencies are usually a part of the state health department, but in some states they are part of a multidisciplinary state public safety department, or are an independent state agency. State EMS agencies are responsible for the overall planning, coordination, and regulation of the EMS system within the state as well as licensing local EMS agencies and personnel.

Thank you for the acknowledgement that emergency medicine is a necessary component of a multidisciplinary approach. NHTSA's long history of focus on emergency medical services must continue in order to reduce death and disability in the post-crash phase. The Office of EMS in NHTSA and the National Emergency Medical Services Advisory Council are to be commended; yet more work remains to be done in order to avert preventable deaths and permanent disability. To this end we call on NHTSA to place more emphasis on post-crash care related to human, vehicular (including equipment), and environmental factors specific to EMS in its strategic plan and resultant programs.

Robust EMS and trauma systems share a common goal with NHTSA, i.e., "...to save lives, prevent injuries, and reduce traffic-related health care and other economic costs due to road traffic crashes...". Research conducted since the publication of the last NHTSA Strategic Plan found that seriously injured patients have a 25% lower death rate when treated at a trauma center, and that trauma victims transported by helicopter have higher survival rates. Given the MAP-21 shift in focus to include serious injury in addition to fatalities, corresponding consideration must be made in the 2014-2018 strategic plan for post-crash care and transportation of patients and more aggressive measures to improve EMS and trauma system data quality and availability.

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The docket invites comments on “gaps in current strategies and approaches”. Ambulances and the risk they pose to the travelling public deserve further evaluation at a national level. Ambulances use roads in completely different ways than passenger and commercial vehicles, place other vehicles at risk depending on how they are operated, and carry the most vulnerable cargo—ill and injured humans. Quantitative analysis of the frequency and severity of ambulance-involved and ambulance-caused crashes performed to date is insufficient to identify policy, procedural, and regulatory remedies to assure that these are the safest vehicles on the nation’s roadways.

Finally, NASEMSO is closely monitoring and whenever possible participating in initiatives related to connected vehicles. In addition to the promise of collision avoidance, other advantages may be gained on behalf of the estimated 28 million patients being transported by ambulance in the U.S. every year. To that end, it is critical that in the early stages of contemplated rules or program activities, the unique needs of ambulances in contrast to passenger cars, commercial trucks, motorcoaches, and other vehicles be thoroughly assessed given the likelihood that selected applications may need to function differently in ambulances versus other categories of motor vehicles.

Thank you for your consideration of these comments and we look forward to the opportunity to review and comment on the NHTSA 2014-2018 Strategic Plan when it becomes available.

Sincerely,



Jim DeTienne

President

National Association of State EMS Officials