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September 16, 2019

Mr. Vincent Robbins, MS, FACPE, FACHE
Chairman
National EMS Advisory Council
United States Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590

RE: Docket No. NHTSA-2019-0061

Dear Mr. Robbins and distinguished members of the National EMS Advisory Council:

The Emergency Nurses Association (ENA) commends the NEMSAC Preparedness and Education Committee for its thoughtful response to the complex issue of paramedic education and licensing in its pre-decisional draft, *“Strategy for the transition of paramedics with formalized education and professional license to practice.”* Much has been accomplished in the 50 years since the National Highway Traffic Safety Administration (NHTSA) first published *Accidental Death and Disability: The Neglected Disease of Modern Society* and the first National Registry of Emergency Medical Technicians (NREMT) Paramedic exam was offered in 1976. Paramedics are now required to graduate from a nationally accredited paramedic program to be eligible for national EMS certification. Currently, 46 states require national EMS certification as a component of state licensure to practice and two states, Montana and Illinois, are actively working to implement a definitive NREMT requirement bringing the nation to a high level of consistency on minimum educational and licensing standards for paramedics. The Commission on Accreditation of Allied Health Education Programs (CAAHEP) standards for paramedic programs already require educational partners to provide a “pathway” for paramedics to achieve an academic degree.

ENA appreciates the opportunity to participate in the recent discussions on EMS nomenclature identified as an EMS issue by the NEMSAC. We respect the variety of opinions but note that no clear consensus was reached on an initiative that was implemented and funded by NHTSA through a Council Advisory. Expert panels involved in recent NHTSA initiatives on scope of practice and EMS Agenda 2050 determined the topics of nomenclature and paramedic degree requirements to be beyond the spectrum of their assignments, however, NEMSAC has not yielded to the expertise of professional associations which traditionally have guided the conversation on these issues.

ENA wholeheartedly supports academic preparation for all health professionals. Our organization and our members have been active participants in the National Academies of Sciences, Engineering, and Medicine (NASEM) “Future of Nursing” series since 2009. The ability of the NASEM to seek and gain consensus on a range of issues has provided a high level of confidence and credibility while serving to enhance the nursing profession. We suggest that NASEM would provide a better venue for the discussion while limiting inherent bias to this important topic. ENA respectfully suggests that the nursing research on workforce issues cited in the NEMSAC draft is applicable to nurses. ENA does not believe it is appropriate for the U.S. Department of Transportation to identify the resources to “define traits or characteristics of being a health professional,” a notation included as a comment in the draft, which seems to reflect the premise of the proposed advisory.

ENA is concerned that the persistent focus on an apparent theme of “enhancing the (paramedic) profession” does not serve the public at large or reflect the global needs of the EMS sectors represented on the Council, including emergency nurses. We feel these discussions are distracting from other efforts to improve patient care, lack the appropriate quality evidence to support, and represent a trajectory that is inconsistent with the Council’s Charter.

ENA views and supports paramedicine as an evolving and legitimate profession within the health care system. As such, ENA believes strongly in a focus on efforts that fulfill EMS needs and bolsters their operation through better system coordination, enhancements to clinical guidelines and improvements in the collection and accuracy of EMS data – all in the name of providing the best possible care to patients.

Sincerely,



Patti Kunz Howard, PhD, RN, CEN, CPEN, TCRN, NE-BC, FAEN, FAAN
2019 ENA President

Cc Jon Krohmer, MD, FACEP
Acting Associate Administrator
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