NAEMT
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April 28, 2022

Gamunu Wijetunge, Director
National Highway Traffic Safety Administration
Office of Emergency Medical Services
1200 New Jersey Avenue S.E.
Washington, DC 20590
Department of Transportation

RE: Public Comments for 2022 National Roadway Safety Strategy

Dear Gam,

The National Association of Emergency Medical Technicians (NAEMT), representing over 72,000 EMS practitioners, would like to offer the following comments into the public record on the request for funding and rule making in the National Roadway Safety Strategy (NRSS). NAEMT's comment offers four recommendations that would complement and support the Implementation of the NRSS corresponding to the *Safe System Approach* element, "Post-Crash Care."

1. Funding whole blood delivery systems to be administered by paramedics in the field. This aligns with the strategy in the Post-Crash Care to improve the delivery of EMS throughout the nation. As cited in the NRSS on page 29, one third of seriously injured crash victims are not taken to a level I or II trauma center. Prehospital whole blood therapy may be the best option for post-crash resuscitation of a victim. The use of whole blood is showing substantial efficacy in the pre-hospital setting. (1) (2) (3)

2. Funding common prehospital trauma certification programs approved by the American College of Surgeons Committee on Trauma and proven to help reduce trauma scene times. This aligns with item four in the Post-Crash Care to improve the delivery of EMS throughout the nation in collaboration with the Federal Interagency Committee on Emergency Medical Services and the National Emergency Medical Services Advisory Council by focusing on shortening ambulance on-scene response times. (4)

3. Supporting financially and with qualified instructors the Traffic Incident Management System (TIMS) training to emergency medical service agencies.

4. Funding the replacement of hydraulic extrication equipment (cutters & spreaders) powered by traditional gasoline power plants with battery powered hydraulic equipment for fire responders using 402 funds. In accordance with *Executive Order 14008 Tackling Climate Crisis at Home and Abroad*, this would deploy the full capacity of Federal executive agencies to combat the climate crisis by implementing a government-wide approach. There are just under 30,000 fire departments in the United States and most have at least one set of extrication equipment, traditionally powered by an internal combustion engine. (5) (6)

On behalf of EMS practitioners tasked with post-crash care and their patients, we respectfully request that funding via Section 402 Highway Safety Programs and Section 405 National Priority Safety Programs be made available to all EMS organizations via the State and Territorial offices of Highway Traffic Safety. Thank you for your consideration of these recommendations submitted as part of the public comment period. These requests have the ability to impact the outcomes of crash victims and align with the goals and objectives of the National Roadway Safety Strategy. Please feel free to contact NAEMT for further information or if there is any additional clarification required on the detail of these requests.

Respectfully submitted,

Bruce Evans, MPA, CFO, NRP, SPO
President, NAEMT

References

(1). Mapp, J. G., Bank, E. A., Osborn, L. A., Stringfellow, M. L., Reininger, D. W., & Winckler, C. J. (2020). Epidemiological and accounting analysis of ground ambulance whole blood transfusion. Prehospital and Disaster Medicine, 35(1), 98-103.

(2). Bullock, W., Schaefer, R., Wampler, D., Stringfellow, M., Dieterle, M., & Winckler, C. C. (2021). Stewardship of prehospital low titer o-positive whole blood in a large urban fire-based EMS system. Prehospital Emergency Care, 1-7.

(3). Sayre, M. R., Yang, B. Y., Murphy, D. L., Counts, C. R., Dang, M., Ubaldi, P., ... & Hess, J. R. (2022). Providing whole blood for an urban paramedical ambulance system. Transfusion, 62(1), 82-86.

(4). Esmaeilzadeh, M. H., Rostamian, M., Khorasani-Zavareh, D., Shirazi, F. B., & Mogharab, M. (2022). The effects of Pre-hospital Trauma Life Support (PHTLS) training program on the on-scene time interval. BMC Emergency Medicine, 22(1), 1-7.

(5). Marcinek, M., & Marková, I. (2014). Working effectiveness of hydraulic rescue equipments for firefighters. In Advanced materials research (Vol. 1001, pp. 517-525). Trans Tech Publications Ltd.

(6). Petrillo, Alan M. (2008) *Battery-Operated Hydraulic Tools Make Big Inroads on Rescue Trucks and Rescue-Pumpers* Fire Apparatus Magazine