



State of Louisiana
Louisiana Department of Health
Office of Public Health
Bureau of Emergency Medical Services

May 5, 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 Louisiana Bureau of Emergency Medical Services is responsible for the overall planning, coordination, licensing and regulation of Louisiana's EMS system. This system is made up of 65 providers and approximately 23,000 practitioners. A large number of these providers are unable to build ambulances that comply with SAE standards for ambulance safety¹ due to lack of funding. Thousands of Louisiana's EMS practitioners, as well as their patients, put themselves in harm's way every time they step into an ambulance.

The Louisiana Bureau of Emergency Medical Services would like to offer the following comments into the public record on the request for funding and rulemaking in the National Roadway Safety Strategy (NRSS) the *Safe System Approach* element, "Safer Vehicles".

1. Funding patient compartment seating integrity and occupant restraint. This aligns with the strategy in the Safer Vehicles elements by providing Emergency Medical Service Practitioners a restraint system that allows them to provide patient care while being properly restrained in a moving vehicle.
2. Funding the replacement of ambulance stretcher mounts and compatible stretchers. Ambulance stretchers have traditionally been mounted to the ambulance floor with an antler type mounting system. This system puts the patient and practitioner at risk for serious or fatal injuries in the event of a rollover motor vehicle accident. The antler type mount system allows the stretcher to become dislodged during impact, making the stretcher a projectile object.
3. Funding ambulance equipment mounting devices or systems. Ambulances carry an array of equipment in the patient compartment. That equipment is often left unsecured in order to properly treat a patient during transport to the hospital. An equipment mounting system

would secure this equipment, within reach of the EMS practitioner and reduce or eliminate the number of projectile objects during a motor vehicle crash.

Thank you for your consideration of these recommendations submitted as part of the public comment period. Please contact the Louisiana Bureau of Emergency Medical Services for further information or if there is any additional clarification required on these requests.

Sincerely,

A handwritten signature in blue ink, appearing to read "Molly Terebieniec".

Molly Terebieniec, NRP
Ambulance Standards Coordinator
Louisiana Bureau of EMS

1. <https://www.sae.org/news/2014/08/new-sae-international-standards-enhance-ambulance-safety>