

May 23, 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 American Ambulance Association (AAA), the national trade association for ground ambulance services 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). AAA's comment offers the following recommendations that would complement and support the Implementation of the NRSS corresponding to the *Safe System Approach* element, "Post-Crash Care."

On behalf of EMS ground ambulance services nationwide we request that all funding via Section 402 Highway Safety Programs and Section 405 National Priority Safety Programs be made available to all EMS organizations, regardless of provider type, via the State and Territorial offices of Highway Traffic Safety. In many communities in the United States, especially rural and super rural, private for-profit ambulance services are the 911 ground emergency ambulance services for that town, city, and/or county. Traditionally, most funding has excluded private for-profits from accessing funding. We humbly request that all provider types be included in any of the funding made available in these provisions.

We request funding for common prehospital trauma certification programs approved by the American College of Surgeons Committee on Trauma and proven to help reduce trauma scene times.

We request 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.

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

Thank you for your consideration of these recommendations submitted as part of the public comment period. Please feel free to contact the AAA for further information or if there is any additional clarification required on the detail of these requests.

Respectfully submitted,

Shanw Baird  
President, AAA