



International Association of Fire Chiefs

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May 23, 2022

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

RE: Response to Request for Comment Relating to Docket No. NHTSA–2022–0036

Dear Mr. Wijetunge,

The International Association of Fire Chiefs (IAFC) is a 501(c)(3) organization that represents over 12,000 members of the emergency medical service (EMS) and fire service worldwide. Our members are the world's leading experts in firefighting, emergency medical service (EMS), terrorism response, hazardous materials incidents, natural disasters, search and rescue, and public safety policy. On the behalf of the IAFC, I thank the National Highway Traffic Safety Administration (NHTSA) for the opportunity to comment on its annual Highway Safety Grant Program.

The IAFC submits the following recommendations regarding post-crash care.

- 1) A significant majority of EMS agencies are small and lack sufficient administrative staff to support their efforts to seek grant funding. Therefore, many of these agencies are often overlooked by state entities. NHTSA should take steps to ensure that grant funding is distributed in a way that makes effective highway safety programs accessible to all EMS agencies.
- 2) Many rural EMS agencies are understaffed and lack the necessary equipment to answer emergency calls for assistance effectively. NHTSA should utilize existing data from the National Emergency Medical Services Information System (NEMSIS) and United States Census Bureau to identify and focus additional funding on rural EMS services.
- 3) NHTSA should collaborate with the National Institute of Standards and Technology (NIST) to focus on technologies that would improve care provided to crash victims such as the use of drones to transport life support technologies to crash scenes and enhancements to crash notification systems that would provide data directly to EMS responders prior to arrival at a crash scene.
- 4) NHTSA should promote greater direct EMS access to data maintained, analyzed and collected by the NEMSIS. This would facilitate greater use of these data to improve post-crash care.

- 5) NHTSA should promote the expanded use of EMS interfaces in Health Information Exchanges to provide post-crash care data directly to EMS providers and agencies through their electronic patient care record systems by directly interfacing these with hospital electronic medical records.
- 6) NHTSA should provide funding to improve public education related to roadway safety. This education would not only improve the safety of the motoring public; it also would better protect first responders who are often exposed to very dangerous circumstances while responding to roadside incidents.

The IAFC thanks the NHTSA for the opportunity to comment on its Highway Safety Grant Program prior to issuing the Notice of Proposed Rulemaking related to this program. The IAFC looks forward to continuing to work with NHTSA to improve the safety of the United States' roadways and post-crash care.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. Stuebing', with a long horizontal flourish extending to the right.

Fire Chief Kenneth W. Stuebing, BHSc, CCP(f)
President and Board Chair

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