



National Association of Emergency Medical Technicians
Post Office Box 1400 * Clinton, Mississippi 39060-1400
Phone: 800-34-NAEMT or 601-924-7744 * Fax: 601-924-7325
Website: www.NAEMT.org

March 11, 2011

NIOSH Docket Office
Robert A. Taft Laboratories
MS - C34
4676 Columbia Parkway
Cincinnati, OH 45226

Docket Number: NIOSH - 223

To Whom It May Concern:

This letter is submitted on behalf of the members of the **National Association of Emergency Medical Technicians (NAEMT)** in response to the request for public comment on Docket Number NIOSH - 223 regarding Emergency Responder Health Monitoring and Surveillance (ERHMS).

Formed in 1975 and more than 32,000 members strong, NAEMT is the nation's only organization solely dedicated to representing the professional interests of all EMS practitioners, including paramedics, emergency medical technicians, first responders and other professionals working in pre-hospital emergency medicine. NAEMT members work in all sectors of EMS, including government service agencies, fire departments, hospital-based ambulance services, private companies, industrial and special operations settings, and in the military.

In reviewing NIOSH's proposed framework on ERHMS, NAEMT and its members have the following comments, input and concerns:

- *Recognizing the risks to EMS practitioners in a disaster* - NAEMT and its members appreciate that this framework acknowledges the risks to EMS Practitioners when they respond to a disaster and the responsibility of their employer to assure their safety and health during those times. We believe that EMS services would benefit from guidance to protect the health and safety of their employees in responding to disasters.
- *Lack of EMS representation in the authoring of this framework* - In reviewing the author list presented in the Draft ERHMS framework document, the lack of representation and involvement from the EMS community in the creation of this framework is of great concern. Given that EMS plays an integral role throughout the framework, we believe appropriate levels of EMS industry input should be part of the development of such frameworks and would ask for additional EMS representation as this framework further develops.

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- *Clarification of regulatory oversight* - We seek clarification on which federal agency will ultimately have direct regulatory oversight of the ERHMS framework, once implemented.
- *Clarification on when it is appropriate to activate ERHMS and for what level of disaster provider* - There seems to be some confusion on what scale of an incident is it appropriate to activate the ERHMS on-scene and post incident follow up portions of the framework. Additionally, we seek clarification on which levels of responder this framework applies to. For example, is it necessary to monitor the health of Paramedics and EMT's not directly involved in rescue operations, but could be transporting evacuees needing non-incident related medical care to a distant evacuation facility (like a nursing home patient).
- *Potential increased response time to disasters* - Due to the significant levels of effort needed to manage and operate under such a framework, we are concerned that following such a framework could potentially delay responders during the initial response and mitigation phases of a disaster.
- *Funding for Public and Private EMS agencies alike* - Communities across our country provide EMS to their residents through a variety of delivery modes involving both the public and private sectors. We request that any ERHMS framework include the recognition of such financial needs both for public and private entities alike.

On behalf of NAEMT and its members, we appreciate the opportunity for input and feedback on this important issue and welcome any additional interaction necessary to facilitate understanding of our Association's position and concerns on this issue.

Sincerely,



Connie Meyer
President, NAEMT