



PENNSYLVANIA

Emergency Health Services Council

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Mr. John Tacosky
Department of Agriculture
Farm Safety and Occupation Health Grant Program
2301 North Cameron Street
Harrisburg, PA 17110-9408

Dear Mr. Tacosky:

The purpose of this correspondence is to provide official comment for the Pennsylvania Emergency Health Services Council regarding the proposed rules and regulations regarding the Farm Safety and Occupational Health Tuition Assistance Program, that were published February 12, 2000.

PEHSC applauds the efforts of the Department in their pursuit to provide opportunities for Pennsylvania's emergency service providers to receive education in the practices and management of farm emergencies.

The only question that was generated regarding the proposed regulations, is in reference to Section 138:4(e) - Eligible Courses, Programs, Training, Activities or Events. This section reads, "Program grants may be awarded to cover or supplement tuition for the types of projects delineated in Section 4(b) of the Act (3 P.S. § 1904 (b)).

In reviewing Section 4 (b) of the Act, Subsection 9 reads, "Training of emergency service providers in methods and procedures for responding to farm emergencies, including:

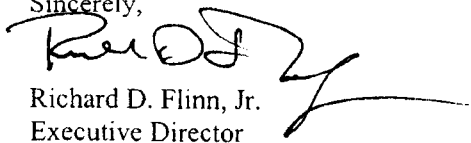
- (i) First-on-the-scene programs for farm families.
- (ii) Firefighting seminars for emergency service providers.
- (iii) Fire safety practices and techniques for farmers.
- (iv) Farm rescue and machinery extraction demonstrations.
- (v) Instructions to reduce or eliminate the risk of exposure to toxic gases.

The question is, will the Department interpret emergency medical care-related programs specifically designed for farm-related emergencies as eligible, given the preceding lists?

Obviously, the first part of that sentence states, "training of emergency service providers in methods and procedures for responding to farm emergencies", which in itself, would include EMS-type courses, however, the list that follows is not specific to EMS.

Thank you for the opportunity to comment on these regulations.

Sincerely,


Richard D. Flinn, Jr.
Executive Director

CC: Executive Committee
Margaret Trimble

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