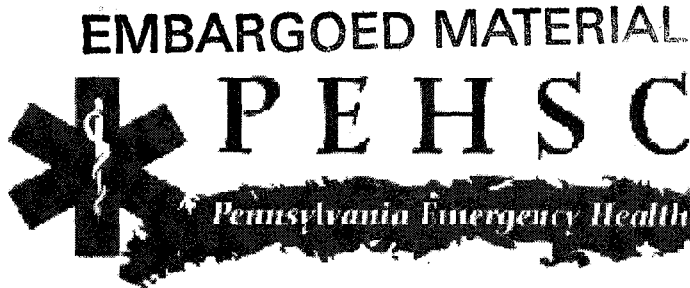


# 2577



RECEIVED  
 2007 OCT 18 AM 7:44  
 REGULATORY  
 REVIEW COMMISSION

October 17, 2007

Mr. Arthur Coccodrilli, Chairman  
 Independent Regulatory Review Commission (IRRC)  
 333 Market Street, 14<sup>th</sup> Floor  
 Harrisburg, PA 17101

Via - e-mail: irrc@irrc.state.pa.us

Dear Chairman Coccodrilli:

After reviewing the comments that were previously submitted by our organization against the final-form regulations, the Pennsylvania Emergency Health Services Council (PEHSC), continues to have concerns about the proposed sexual assault regulations #10-182 (#2577). The concerns are as follows:

1. Under the proposed final-form regulations, patients would need to be transported to a participating facility which provides sexual assault treatment. According to the statewide EMS protocols, if a patient presents with traumatic injuries requiring immediate care, they are to be transported to the closest appropriate facility (i.e. trauma center). It is our opinion, that patients in these circumstances should receive comprehensive care for all their needs without the burden of being transported to an additional facility.
2. Traditionally, pre-hospital providers are not updated by facilities in regard to the level of services they provide. Therefore, patients should be transported to the closest receiving facility, unless the patient opts (patient choice) for delivery to another receiving facility which is within a reasonable distance to the closest receiving facility. Receiving facilities, as identified in Title 28, Chapters 1001-1013, are specifically designated to meet the emergency care needs of patients transported by ambulances in the Commonwealth. Furthermore, pre-hospital providers should not be required to know all of the available specialty services at each receiving facility on a daily basis, as determination of this information may interrupt or delay patient care. Simply, receiving facilities should be able to provide all services needed to patients transported via ambulance.
3. Finally, we are seeking further clarification as to the payment for transport services for patients needing ambulance level care. We understand that services cannot be charged to the patient, however, we are unclear as to how ambulance services will be paid in a timely fashion for their reasonable and customary charges.

Thank you for taking the time to consider our comments. I apologize for my inability to be present at the hearing tomorrow.

Sincerely,

Janette M. Kearney  
 Director

**Gelnett, Wanda B.**

RECEIVED

**From:** Janette Kearney [jkearney@pehsc.org]  
**Sent:** Wednesday, October 17, 2007 4:41 PM  
**To:** IRRC  
**Subject:** Regulation #10-182 (#2577)

2007 OCT 18 AM 7:44

INDEPENDENT REGULATORY  
REVIEW COMMISSION

Sorry for the delay - please see the attached letter.

**JANETTE M. KEARNEY**  
**Executive Director**  
**PA Emergency Health Services Council (PEHSC)**  
**600 Wilson Lane, Suite 101**  
**Mechanicsburg, PA 17055**  
**717-795-0740 or 800-243-2EMS in PA**  
**717-795-0741 FAX**  
**www.pehsc.org e-mail – jkearney@pehsc.org**

The PEHSC is a statewide advocacy group that has been fostering improvements in the quality and delivery of emergency health services throughout the commonwealth for over 30 years. Since 1985, the PEHSC has been recognized as the official advisory body to the Pennsylvania Department of Health and all other appropriate agencies on matters pertaining to emergency medical services.

The staff and Board of Directors are dedicated to the improvement and enhancement of Pennsylvania's EMS system to effectively support the emergency health needs of the citizens and visitors of the commonwealth.

To become involved in the PEHSC as an organization or individual, visit our website at [www.pehsc.org](http://www.pehsc.org) - there is no fee for membership.