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**EMS LAWRENCE COUNTY COUNCIL
110 E. LINCOLN AVENUE #2B
NEW CASTLE, PA 16101**



August 5, 2013

Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Re: Department of Health – Emergency Medical Service System
Regulation Number: #10-190 (IRRC #2917)
Date of Hearing: August, 22, 2013

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To Whom It May Concern:

On behalf of EMS Providers in Lawrence County we want to show our support for the new EMS Regulations for the Commonwealth of Pennsylvania.

Our organization is comprised of Volunteer and Career EMS Providers all of whom are engaged in providing exemplary emergency medical care to our patients. One aspect of continually improving patient care is a thorough Quality Assurance/Improvement process. We applaud the Commonwealth by adding coverage through the "Peer Review Protection Act (63 P.S. §§ 425.1-425.4)" that will provide immunity to EMS Providers who are participating in Quality Assurance Projects as required in the EMS Regulations under *Subchapter D, Section § 1021.63 Peer Review*. Historically many providers and services have been hesitant about sharing information from ambulance runs that may or may not have had poor patient outcomes in their fear that this information may lead to unfounded allegations and/or legal suites.

Another area of need for rural areas of the Commonwealth that has been addressed by these regulations is allowing EMS Providers who were previously certified as a Paramedic (or at the new level of an Advanced EMT) to downgrade to a BLS certification as addressed in *Subchapter B, Section § 1023.21 General rights and responsibilities (g) Downgraded to certification or practice*. There have been several instances of a Paramedic who for any one of several reasons cease practicing at the ALS level, however is a member of volunteer BLS QRS and wishes to continue to provide care in his or her local community. The new rules and regulations allow for a downgrade in certification and will keep EMS Providers available to respond to calls for service in the Commonwealth who in the past would have been lost from the EMS System.

Once again our organization fully supports the adoption of these Rules and Regulations as they relate to the Emergency Medical Service System in the Commonwealth of Pennsylvania.

Sincerely:

Brian Shaw,
President