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August 14, 2013

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Independent Regulatory Review Commission
333 Market Street, 14th Floor
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Dear Commissioners:

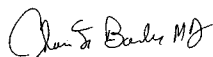
On behalf of the board of directors of the Pennsylvania Chapter, American College of Emergency Physicians (PaACEP), I am writing to you regarding Department of Health–Emergency Medical Services System regulation #10-190 (IRRC #2917). The implementation regulations were promulgated for Emergency Medical Services (EMS) System Act 37 of 2009.

The chapter recommends approval. The final-form regulations contain many new or clarifying standards such as the requirement that all EMS agencies must have an EMS agency medical director; that standards for all individuals and entities regulated by the Department of Health will be clarified; and that EMS vehicle and service standards for EMS vehicles and services will be established. We believe these and other system updates will improve the quality and safety of the patient care delivered by EMS personnel in the Commonwealth.

Efforts to update and improve the Commonwealth’s EMS system began over ten years ago. Over the years PaACEP and many stakeholders have provided input directly to the department, and through town hall meetings at various stages of legislative and regulatory development. In order to achieve a higher-quality and more responsive system, there is a compelling public interest to bring this process to a close. The final-form regulations are in line with national standards and are consistent with many other states that are making system improvements.

EMS does not exist in isolation; it is community-based and represents the intersection of public safety, public health, and the overall health care system. As outlined in the Act 37 preamble, it is in the public interest to assure that there is a high-quality and coordinated system that can quickly adapt and evolve to meet emergency and urgent medical care needs. Approval of the final-form regulations will help ensure that this goal is met with a better coordinated system that is flexible and responsive to the needs of the people of the Commonwealth.

Sincerely,



Charles F. Barbera, MD, MBA, FACEP
President

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