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2917

August 19, 2013

Mr. Richard Gibbons Director, Bureau of EMS Pennsylvania Department of Health Health & Welfare Building, Room 606 625 Forster Street Harrisburg, PA 17120-0701

Frank J. Trembulak

Chief Operating Officer

Executive Vice President

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HEALTH SYSTEM

Dear Mr. Gibbons:

Geisinger Health System¹ is pleased to endorse the Department of Health's Emergency Medical Services Final-Form Regulation Number 10-190 (IRRC #2917).

Geisinger serves more than 2.6 million residents throughout 33 counties in central and northeastern Pennsylvania. Additionally, Geisinger is the nation's largest rural health services organization. As such, we can attest that the quality of the Emergency Medical Services ("EMS") community is of utmost importance. The service that pre-hospital care providers render is vital to the patients we both serve.

Final-Form Regulation Number 10-190 will improve patient care by: enabling care gaps to be filled by allowing the utilization of EMS personnel in expanded roles; allowing for more appropriate transport of critical care patients by providing for critical care ground ambulances; and, sanctioning transportation options to various facilities rather than requiring transport to hospitals.

We believe these regulations will assist in achieving not only a higher quality EMS system, but also a more coordinated and integrated EMS system. Additionally, it will enable Pennsylvania to be a leader in developing new practice models as the delivery of healthcare continues to evolve.

The Department of Health and the Bureau of EMS have engaged all stakeholders—public, private, and governmental—by hosting town meetings throughout the Commonwealth to discuss and seek comment on the proposed regulations.

Thank you for the opportunity to register Geisinger's support of Final-Form Regulation Number 10-190.

Respectfully submitted,

Frank Trembulak

cc: Independent Regulatory Review Commission ("IRRC")

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¹ Throughout this document the acronym "GHS" or the terms "System," "Geisinger" or "Geisinger Health System" shall refer to the entire Health Care System comprised of the Geisinger Health System Foundation (the "Foundation") as parent and all subsidiary corporate entities comprising the Health Care System.

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August 21, 2013

TO: Pennsylvania Independent Regulatory Review Commission

FROM: Ms. Michele Bolles, Senior Vice President, Health Strategies Great Rivers Affiliate, American Heart Association/American Stroke Association

SUBJECT: Regulation #10 – 190: Emergency Medical Services System (IRRC Number 2917)

On behalf of the American Heart Association, the American Stroke Association (AHA/ASA), and the thousands of volunteers that contribute their time and talent to our organization in Pennsylvania, I would like to submit this letter in support of the Department's final version of the Emergency Medical Services (EMS) regulations, as required through Act 37 of 2009.

Cardiovascular diseases are the leading cause of death of Pennsylvanians. Emergency medical services professionals are critical in the timely diagnosis, treatment and transportation of acute medical emergencies, including heart attacks, stroke and cardiac arrest. The final regulations will go far to advance the AHA/ASA's mission to build lives free of cardiovascular disease and stroke. Additionally, the regulations provide the necessary coordination and oversight of prehospital care across the Commonwealth that effectively integrates a broad spectrum of general and specialty services.

We look forward to continuing our strong partnership with the Department of Health, Bureau of Emergency Medical Services to advance the work of pre-hospital care to further reduce death and disability from cardiovascular diseases and stroke.

Thank you for your careful review of the final regulations.

Sincerely,

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Michele Bolles Senior Vice President, Health Strategies