



Ridgway Ambulance Corporation

120 N. BROAD STREET P.O. BOX 297 RIDGWAY, PENNSYLVANIA 15853
PHONE (814) 773-3633 FAX (814) 772-1001 FEDERAL I.D. # 25-1202426

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11/18/2011

Mr. Joseph W. Schmider, Director
Bureau of Emergency Medical Services
Department of Health, Room 606 Health and Welfare Building
625 Forster Street
Harrisburg, PA 17120-0701

Dear Mr. Schmider,

It's with great concern that I am writing this letter in regards to the proposed rulemaking changes for Act 37. As a rural volunteer ambulance service provider for Elk County I'm concerned about the current minimal staffing requirements as set forth by this proposed rule, more specifically section 1027.34 sub title (b) *Staffing*. The paragraph states that for an ALS response the minimal staffing is EMSVO, a second provider at or above the EMT level and a provider above the AEMT level. Unless it's a two person crew then the second provider has to be at or above EMT level.

So basically for any ALS response the rural ambulance service can't utilize an EMSVO or an EMR to drive the ambulance, we have to utilize and EMSVO at or above the EMT level. That's a difficult task to achieve in a small volunteer ambulance service, to waste the resources of a minimal EMT to drive an ambulance when the service has several EMR's available to do so. It shouldn't matter who is driving the ambulance as long as they meet the minimal standards of EMSVO, once that individual assumes the driving responsibilities, they are committed to driving the ambulance and have no direct patient care what so ever.

As a manager of a rural ambulance service for nearly a decade and a paramedic our focus is providing the utmost pre hospital care to our community as long as direct patient care is not compromised whomever is driving the ambulance as long as they meet the minimal standards of EMSVO are irrelevant to direct patient care and more vital in our situation to whether an ambulance gets in enroute to the scene in a timely fashion.

Sincerely,

Sean M. Papa NREMT-P
Manager
Ridgway Ambulance Corporation