



**PENNSYLVANIA EMERGENCY
HEALTH SERVICES COUNCIL**
Your Voice In EMS

RECOMMENDATION FOR CONSIDERATION

Board Meeting Date: June 13, 2018

Subject: Use of Agency-Developed Treatment Protocols

VTR#: 0618-03

Committee/Task Force: Critical Care Transport Task Force

Recommended Goal

Recommended Policy Change

Other:

Recommendation:

- 1. The Department of Health should, based on the authority granted by the EMS regulations related to exceptions, issue a blanket exception permitting the use of agency developed, Department approved treatment protocols by licensed ground critical care ambulance agencies.**
- 2. The Department should issue a clarification on the use of agency developed, Department approved protocols for air ambulance agencies when a flight team is required to utilize a ground ambulance for transport due to adverse weather conditions, mechanical failure or other unforeseen circumstances.**

Rationale [Background]:

Consistent with the authority granted to air ambulance agencies, the Department of Health should issue a blanket exception under 28 Pa.C. § 1021.4, [related to exceptions], to permit the use of agency-developed, Department approved protocols by licensed ground critical care transport ambulance agencies. This exception enables agency medical directors to provide offline medical direction to the expanded scope paramedics and PHRNs, who typically staff ground critical care ambulances, beyond that provided by statewide BLS, ALS and CCT protocols.

While task force cannot speak to why agency developed protocol use was not included in the regulations for ground critical care transport ambulance agencies, it is the task force's position that agency-level protocols should not be "mode of transport" dependent. Furthermore, by not permitting a crew with the same qualifications to use agency-level protocols during ground critical care transport, an inconsistent standard of care is created, especially for an agency licensed to provide both modes of transport.

On a related note, the regulations [28 Pa.C. § 1027.40 (e)] permit the use of Department approved, agency protocols by air ambulance agencies. However, the regulations do not specifically speak to their use in situations when the flight team is required to transport a patient by ground ambulance due to adverse weather conditions, mechanical failure or other unforeseen circumstance. Although the regulated community currently interprets this as a permitted use, the task force requests the Department clarify and/or affirm this interpretation.

Medical Review [Concerns]:

The critical care transport task force has significant physician representation who support this recommendation.

Fiscal Concerns:

None

Educational Concerns:

Agency medical directors are responsible to provide education and ensure competency for each agency-developed protocol.

Plan of Implementation:

The Department of Health should:

1. Issue a blanket exception permitting the use of agency-developed, Department approved protocols by licensed ground critical care transport ambulance agencies.
2. Issue a clarification on the use of agency-developed protocols by an air ambulance agency when a flight team experiences an unforeseen circumstance, requiring them to transport a patient by ground ambulance.

The PEHSC Committee/Task Force offers consultation to the Department in regard to the content of this Vote to Recommend (VTR) and its attached documents. The PEHSC Committee/Task Force specifically offers staff or member support to participate in Department deliberations regarding this recommendation in an effort to convey committee/task force discussions.

Board Meeting Comments/Concerns:

None.

Signed: J. David Jones
President *9/15*

Date 6-13-18

For PEHSC Use Only – PA Department of Health Response

Accept: _____ Table: _____ Modify: _____ Reject: _____

Comments:

Date of Department Response: _____