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From: Donald Garner Jr <Donald.Garner@wakegov.com>
Sent: Thursday, February 11, 2021 11:28 AM
To: Rulescoordinator, Dhsr
Cc: Messer, Michael T
Subject: [External] EMS and Trauma Rules Public Comment

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To whom it may concern,

Thank you for the opportunity to submit comments on the proposed rule changes. I have one comment in reference to: 10A NCAC 13P .0602 Basic and Advanced EMS Educational Institutions requirements, (a) (1) *“EMS Educational Institutions shall complete a minimum of two initial courses for each educational program approved for the Educational Institution’s credential approval period.”*

I understand the Office of EMS is trying to ensure Educational Institutions are meeting the needs of their respective communities and I support that goal. That said, I’m concerned this may be too prescriptive and doesn’t offer needed flexibility to Educational Institutions. I would propose a modification that would allow the Education Institution to demonstrate that their course offerings are meeting EMS System’s need. This could be accomplished through their CoAEMSP Advisory Committee and/or the EMS System’s Peer Review Committee. The Educational Institution could elect to offer two courses at each level or provide documentation indicating the EMS System’s needs are being met without two offerings at each credential level.

Advanced Educational Institutions have EMS agencies represented on their CoAEMSP Advisory Committees. The Educational Institution could demonstrate to the Office of EMS (through surveys, meeting minutes, etc.) how their offerings are meeting the needs of the EMS System. Basic Educational Institutions could use EMS System’s Peer Review Committees to discuss and approve course offerings. As an example, Wake County EMS doesn’t primarily need or want AEMTs. We don’t care if Wake Tech offers that exit point or program. We would rather Wake Tech offer an additional paramedic program than conduct an AEMT course. Forcing Wake Tech to teach two AEMT classes doesn’t necessarily do either party any good.

I believe this adjustment to the proposal would strengthen the proposed rule, and also foster the relationships between the Educational Institutions and their communities of interest.

Thank you,

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