



New Jersey Emergency Medical Services Educator Association

138 Buena Vista Ave
Hawthorne, NJ 07506
<http://www.NJEMSEA.org>

The State of New Jersey is contemplating revisions to NJAC 8:40A, the law that governs the certification of Emergency Medical Technician – Basics and the instructors and training agencies that perform the EMT-Basic training. In careful review of the proposed changes to NJAC 8:40A, the NJEMSEA's positions are as follows:

DOES NOT support Item 8:40A-7.5, 8:40A-9.5 - Emergency Preparedness Training Initiatives as written.

NJEMSEA would support the initial training requirement but opposes a 12 elective burden of Homeland Defense courses. NJEMSEA would like to see a reference, if any, requiring repeated coursework in Homeland Defense from any other agency. The industry standard for law enforcement and firefighters is to undergo these trainings once, not every three years. NJEMSEA suspects that this may be a misinterpretation of the Federal Government's and/or Attorney General's recommendations. NJEMSEA furthermore believes that an EMT's limited continuing education time may be better served if applied to topics applicable to his/her primary role as a medical provider. EMT-Basics should focus the required recertification time obtaining education in clinical topics that affect their everyday activities, such as learning about cardiac and respiratory emergencies and trauma. Dedicating half of the elective con-ed burden to domestic preparedness topics that are rarely utilized would be a poor use of their limited learning time. NJEMSEA feels that the initial training requirement establishes the familiarity necessary to establish a functional awareness of the topics, and that the 12-hour burden every three years would be excessive. EMT-Basics and the systems they work in should use that time to focus their efforts on the type of learning on the type of event common in their service areas (trauma management in violent urban systems, geriatric care in retirement communities, etc).

DOES NOT support Item 8:40A-9.5(f) - Regulation of Course Times. NJEMSEA believes that the current regulations, as written, would restrict the flexibility of EMS organizations to offer classes on-shift. The only potential benefit would be ease-of-auditing by OEMS, which would not outweigh the burden imposed on the EMS community. NJEMSEA also believes that the actual number of audits and the actual number of overnight courses are so small, that they do not outweigh the restriction of providing education to those groups whose primary shifts may fall between 11pm and 7am.

DOES support Item 8:40A-10.1(c) - EMT use of NAAK. NJEMSEA supports this change and applauds the formalization of this intervention into the EMT-Basic scope of practice.

DOES support Item 8:40A-10.1(c) - EMT use of Epinephrine Auto-Injector. NJEMSEA supports this change and applauds the formalization of this intervention into the EMT-Basic scope of practice.

DOES support Item 8:40A-10.1(c) - EMT use of Multi-Lumen and Esophageal Airways. NJEMSEA supports this change and applauds the formalization of this intervention into the EMT-Basic scope of practice. NJEMSEA suggests that since BLS agency managers will be likely to purchase devices named in the regulation, that OEMS consider removing specific devices from the legislation and limit itself to language that defines the class of device such as "Blind Insertion Esophageal/Pharyngeal/Multilumen Airway Device as determined by the Medical Director". Current language puts manufacturers of acceptable devices such as King LT Airway at a disadvantage, even though the text states "not limited to" the mentioned devices.

DOES support Item 8:40-8.2(b) - EMT-Basic Recertification Forms Filing Time. NJEMSEA supports this measure and applauds the easing of administrative burdens on EMT-Basic coordinators.

DOES NOT support Item 8:40A-9.3 - CEU Course Cancellation Notice Time. NJEMSEA strongly opposes the 72 hour notice for the cancellation of CEU courses, with financial penalties for violations of 8:40A. This restriction is not realistic in cases of inclement weather, cancellations by a group as opposed to an instructor, and in emergency situations. The change, as written in 8:40 10.2(f), would fine the instructor \$200 for the first occurrence, and \$500 for the second and subsequent occurrence, in the following very reasonable situations:

An instructor with very specialized certifications (HazMat Technician Instructor) is scheduled to teach a class. The instructor gets pneumonia 2 days before the course and is hospitalized. The instructor's credentials are so unique that he cannot be replaced on short notice. The class is rescheduled for the week after. As written in the proposed changes, the instructor is in violation of 8:40A and punishable by the above fines.

An instructor is scheduled to teach a private CORE 2 for a first aid squad. Tragically, a member's family member passes away 2 days before class and the wake scheduled in conflict with the class. The first aid squad cancels the class. As written in the proposed changes, the instructor is in violation of 8:40A and punishable by the above fines.

An instructor is scheduled to teach Medical Ethics for a medical transportation company. That morning, heavy snow sets in and the Governor declares a state of emergency and calls for limited use of roadways. The class is cancelled. As written in the proposed changes, the instructor is in violation of 8:40A and punishable by the above fines.

The only perceived benefit of this change is ease-of-auditing by OEMS. NJEMSEA would welcome the opportunity to work with OEMS to create a mechanism by which OEMS can audit courses with little logistical difficulty without creating unrealistic burdens on the instructor community.

DOES support Item 8:40A-12.1 - SIDS Investigation Reporting. The NJEMSEA marginally supports this change. The NJEMSEA defers to the expertise of the forensic experts who claim that this regulation would improve research on the subject.

DOES support Item 8:40A-13.1(b) - Acceptance of Electronic Signatures. We support this measure and applaud the easing of administrative burdens on EMT-Basic coordinators.

In summary, the NJEMSEA applauds OEMS' efforts to modernize 8:40A and the general process of certifying EMT-Basics, but our membership believes that the proposed changes need revisions in the above areas. In an effort to be constructive to the revision process, the NJEMSEA would welcome the opportunity to work with the Department to institute changes that would be beneficial to the EMS industry and its educators.

Sincerely



John Mateus
NJEMSEA President



William Rosen
NJEMSEA Vice-President

The following organizations and individuals have fully or in part endorsed the NJEMSEA position paper and support our request to have changes made the proposed 8:40A before it goes to legislature:



New Jersey Association of Paramedic Programs



New Jersey State Safety Council



Medical Transportation Association NJ



Hunterdon County EMS Squad Chief's Association



East Bergen Ambulance Association



Mercer County Regional EMS Association



Steven Vetrano, DO



Mark Merlin, MD