



National Association of State EMS Officials
201 Park Washington Court • Falls Church, VA 22046-4527 • www.nasemso.org
703-538-1799 • fax 703-241-5603 • info@nasemso.org

July 29, 2010

Mr. Alexander Sinclair
US Department of Transportation
Occupant Protection Division (NTI-112)
Office of Impaired Driving and Occupant Protection, Research and Program Development, Traffic Injury
Control
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Mr. Sinclair:

The National Association of State EMS Officials (NASEMSO) appreciates the opportunity to comment on **“Draft Recommendations for Safely Transporting Children in Specific Situations in Emergency Ground Ambulances,”** which I have referenced in this letter simply as *Recommendations*. We have solicited our membership for input and would like to provide the following for your consideration.

OVERALL COMMENTS:

The highest volume of comments was related to an Appendix that was included in early drafts of the document that is not included in the current version. This document, formerly known as “*Appendix C-- Equipment to Support Recommendations for the Safe Transportation of Children in Ground Ambulances*” featured several child passenger restraint products that are currently being marketing to EMS agencies. NASEMSO believes that in order for the *Recommendations* to be implemented in the field, providers and inspectors/ regulators need to have a representative sample of the current types of restraint for children. Appendix C seems to represent reasonable information on current equipment. Without this important reference, EMS agencies will continue to struggle with product selections that may not adequate reflect the *Recommendations*. Several states commented that the merits of including the Appendix are immeasurable and expressed strong support for including it in the final document. NASEMSO acknowledges the complexities of this request and if it would assist in the dissemination of information that is highly desired by the states, NASEMSO is willing to make the Appendix available to states that wish to use it and/or make it available on the NASEMSO website with appropriate warnings and disclaimers. We will await further instruction from you on this element.

States appreciate the effort to represent a scenario in terms of “ideal” and reasonable approaches. This information will make these recommendations more implementable.

SPECIFIC COMMENTS:

On pages 16 and 20, the reference(s) to the fact that an infant only seat should not be used in a rear-facing EMS provider’s seat must be highlighted and a footnote added to explain why it should not be used on a rear-facing seat. As currently written and formatted, the point could be easily overlooked.

On page 17 and 18, footnotes 17, 18 and 20 all say the same thing. Perhaps only one footnote is needed.

The guidelines specifically state that child seats should not be placed on the squad bench because the side-facing configuration is not safe for the child and is contrary to manufacturers recommendations for patient transport. Yet, in appendix D, pg. 43, in reference to the use of a Convertible Child Safety Seat and Car Bed, the

recommendation is to place the care bed laterally across the cot. This places the patient perpendicular to the direction of travel. Is this contradictory to other guidance in the document?

Ambulance manufacturers are now experimenting with alternative patient compartment configurations, one which places the cot laterally in the patient compartment, perpendicular to the road. How would such a configuration affect the safety of transporting pediatric patients?

Overall, the document represents available science and best practice recommendations from an interdisciplinary team of experienced professionals. We deeply appreciate the tremendous effort by NHTSA's working group and believe the recommendations will move the industry towards greater scientific testing and the development of additional devices that will be cost-effective and safe for those who are faced with transporting children in ambulances. As a national organization with a shared commitment to emergency care for children, we wish you well in your continued efforts.

Sincerely,

A handwritten signature in blue ink, appearing to read "S2BL" with a stylized flourish at the end.

Steven Blessing
NAEMSO 2008-2010 President