

From: Jan Eichel
To: Thornton, Kyle L, DOH; Lopez, Stephanie, DOH
Subject: [EXTERNAL] 7.27.5.13, D. Public Hearing
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Good morning,

I am writing to comment on TITLE 7 CHAPTER 27 PART 5

HEALTH EMERGENCY MEDICAL SERVICES CERTIFICATION OF AIR
AMBULANCE

7.27.5.13 CERTIFICATION PROCESS AND PROCEDURES:

To understand my concern, it is a fact that CAMTS accredits more rotor-wing (helicopter) agencies than any other accrediting body in the world. Please review our website for a list of rotor-wing, fixed-wing, and ground services serving all of North America and multiple continents worldwide (<http://www.camts.org>).

My concern is that CAMTS is not listed in **7.27.5.13, D. Deemed Status; minimum standards**: alongside EURAMI and NAAMTA, despite being the only agency that meets all the criteria listed in that section.

Please consider my input while contemplating the EMS rule change. You may reach out to me for any clarification involving CAMTS. Thank you for your time and consideration of my request.

D. Deemed status; minimum standards: The bureau may, on a case-by-case basis, grant deemed status for certification to services that are fully accredited by either the European Aero-Medical Institute (**EURAMI**), the **National Accreditation Alliance of Medical Transport Applications (NAAMTA)**, or another bureau-approved national or international air ambulance accreditation service, provided that the accreditation service meets the following minimum standards:

- (1) provides accreditation for no more than three consecutive years without an updated inspection and reaccreditation;
- (2) (3) has a multi-disciplinary board of directors representing medical transport organizations; uses trained site-surveyors with experience in medical transport at the level of accreditation and license;
- (4) assures services that have identified standards deficiencies will implement corrective action or improvement plans to correct any deficiencies; has an open process that encourages and accepts comments on changes to its
- (5) accreditation standards;
- (6) provides transparency to the public on its standards, accreditation process, list of accredited programs, and policies and procedures; and
- (7) allows immediate access for bureau inspection of any documentation required in this rule.

With respect,

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