



## Submitted comments for Standards Changes from the 12<sup>th</sup> Edition to the 13<sup>th</sup> Edition Standards

### Comments for the FIRST Draft

#### Comments # 1 - # 32

Closed August 31, 2024

Committee responses are in red.

With additional feedback from the November 2024 Aviation Advisory Committee

Date 01/22/2024 #1

Standard # - Suggested Change and Rationale for Change

**CHANGE DEFINITION:** Accidents – An occurrence associated with the operation of an ambulance/aircraft that takes place between the time any person boards the ambulance/aircraft with the intention of flight/transport and until all such persons have disembarked, and which any person suffers death or serious injury, or in which the ambulance/aircraft was substantially damaged. Substantially damaged is defined as any damage to the aircraft that results in a major repair as outlined in 14 CFR Part 43, Appendix A, of the Federal Aviation Regulations, and documented on an FAA Form 337. This includes missions with a patient on board as well as missions that support the transport service's operations including maintenance, training, fueling, and marketing.

The committee agrees with the recommendation and believes it needs to better address surface vehicles. The recommended changes are (addition wording in underline):

**Accidents – An occurrence associated with the operation of an ambulance/aircraft that takes place between the time any person boards the ambulance/aircraft with the intention of flight/transport and until all such persons have disembarked, and which any person suffers death or serious injury, or in which the ambulance/aircraft was substantially damaged. For aircraft, substantially damaged is defined as any damage to the aircraft that results in a major repair as outlined in 14 CFR Part 43, Appendix A, of the Federal Aviation Regulations, and documented on an FAA Form 337. For surface vehicles, substantial damage is defined as any damage to the vehicle that takes it out of service, temporarily or permanently. This includes missions with a patient on board as well as missions that support the transport service's operations including maintenance, training, fueling, and marketing.**

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Date 01/22/2024 #2

Standard # - Suggested Change and Rationale for Change

**01.06.02 page 1.10 ADDITION New #2 # 2.** A policy or procedure addresses verification of all new advanced certifications and license. Only those verified may be used within the program's employment."

The committee agrees with the suggestion and will add a new standard:

**01.06.02, 6. A policy or procedure addresses verification of all new advanced certifications and licenses. Only those verified may be used within the program's employment.**

**02.03.07 2. d. page 2.14 Addition** Helmets are inspected BY AN APPROPRIATELY TRAINED HELMET INSPECTOR on a regularly scheduled basis - at least annually at a minimum.

The committee agrees with the concept of the suggestion but believes this might take some time for programs to develop their workforce, so “strongly encouraged” would better for the 13<sup>th</sup> edition. The standard currently reads “Helmet are inspected on a regular schedule basis – at least annually at a minimum.” will be changed to read:

**Helmets are to be inspected by an appropriately trained helmet inspector on a regularly scheduled basis and at least annually. Helmet manufacturer training of the designated helmet inspector(s) is strongly encouraged.**

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Date 01/22/2024 #3

Standard # - Suggested Change and Rationale for Change

The current standard reads: “Supplemental oxygen is available for RW pilots who have the potential to fly more than 30 minutes above 9,000 feet MSL, or as applicable to local topography.”

**Revision: 02.03.07 2.h, Page 2.16** Change standard to read

“For programs that operate unpressurized aircraft at altitudes above 9000 feet MSL, the following policies should be developed, implemented, and evaluated through an on-going QMS/SMS process:

- o A process to allow flight crew member(s) to become acclimated to high altitude environments at the base elevation and operating altitudes. Process must also consider reacclimating following a prolonged absence at lower elevations.
- o Awareness training to recognize, and if necessary, react to any potential hypoxic events.
- o If possible, use technology to assist in risk mitigation such as operable autopilot, and NVG equipment, as well as personal monitoring equipment that could assist the flight crew in early detection of hypoxia.
- o Make supplemental oxygen available to flight crew member(s) when operating above 9000 feet MSL for more than 30 minutes.

The committee agrees with the changes and will reword the standard to:

**For programs that operate unpressurized aircraft at altitudes above 9000 feet MSL, the following policies should be developed, implemented, and evaluated through an on-going QMS/SMS process:**

- **A process to allow flight crew member(s) to become acclimated to high altitude environments at the base elevation and operating altitudes. Process must also consider reacclimating following a prolonged absence at lower elevations.**
- **Awareness training to recognize, and if necessary, react to any potential hypoxic events.**
- **If possible, use technology to assist in risk mitigation such as operable autopilot, and NVG equipment, as well as personal monitoring equipment that could assist the flight crew in early detection of hypoxia.**
- **Make supplemental oxygen available to flight crew member(s) when operating above 9000 feet MSL for more than 30 minutes.**

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Date 01/21/2024 #4

Standard # - Suggested Change and Rationale for Change

I respectfully recommend adding a standard that all CAMTS-accredited programs have their information uploaded to, and up to date in, the Emergency Transport Healthcare Operations and Safety (ETHOS) database. I recommend information be updated at least twice per year and more often with any significant base-level alterations including base openings, closing, moves, and aircraft changes. ETHOS is the replacement for the previous ADAMS database. The project is a public/private partnership between Medieval Foundation International, Inc. and multiple national organizations including the American College of Surgeons Committee on Trauma, National Association of EMS Physicians, American College of Emergency Physicians, Air Medical Physicians Association, National Association of State EMS Officials, and many more public and private enterprises. Having a single, comprehensive, and GIS-linked repository of air medical services in the United States is key for important advocacy, operations, and research efforts. Without the ETHOS database, the industry is not armed with important data to inform safe and efficient practices and operations in the future. With the ETHOS database there can be a national repository of air medical service base locations to aid in disaster preparedness among other operational endeavors. For example, the secret service previously used the ADAMS database when planning presidential trips. In addition, national organizations can use the information housed in ETHOS to advocate for patients in a multitude of ways. Without knowing the current landscape of air medical services in the US, we cannot adequately inform future advocacy efforts around patient and aircraft safety, system design, or preparedness. Lastly, the ADAMS data was crucial for many high-impact research projects. Trauma, neuro-critical care, burn, and pediatric literature (just to name a few!) often relies on prehospital data. With the ETHOS data, researchers can continue to publish practice changing research which helps patients and providers alike. Thank you for your consideration.

The committee believes support of the ETHOS data base is important and should be strongly encouraged, but some programs may resist for various reasons. For the 13<sup>th</sup> Edition the committee suggests the following addition:

**01.05.05 Programs are strongly encouraged to report, and keep current, their program information in the Emergency Transport Healthcare and Safety (ETHOS) data base. (<https://ethos.aams.org/>)**

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Date 01/23/2024 #5

Standard # - Suggested Change and Rationale for Change

Incorporate reporting of data into the ETHOS database as part of the standards.

The committee believes support of the ETHOS data base is important and should be strongly encouraged, but some programs may resist for various reasons. For the 13<sup>th</sup> Edition the committee suggests the following addition:

**01.05.05 Programs are strongly encouraged to report, and keep current, their program information in the Emergency Transport Healthcare and Safety (ETHOS) data base. (<https://ethos.aams.org/>)**

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Date 01/23/2024 #6

Standard # - Suggested Change and Rationale for Change

Suggestion inclusion of new standard the requires participation in the ETHOS air medical resources database and maintaining updated and accurate information in the database. This will ensure a comprehensive understanding of air medical resources and assets in the US and provide CAMTS will an easy and reliable database of accredited programs with accurate base demographics.

The committee believes support of the ETHOS data base is important and should be strongly encouraged, but some programs may resist for various reasons. For the 13<sup>th</sup> Edition the committee suggests the following addition:

**01.05.05 Programs are strongly encouraged to report, and keep current, their program information in the Emergency Transport Healthcare and Safety (ETHOS) data base. (<https://ethos.aams.org/>)**

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Date 01/23/2024 #7

Standard # - Suggested Change and Rationale for Change

Addendum - Consider adding the medical elements scoring sheets to the 13th edition addendums.

This suggestion is being referred to the CAMTS Protocol Committee.

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Date 01/23/2024 #8

Standard # - Suggested Change and Rationale for Change

**03.05.01, Page 3.15** Move the bullet and line to the right as a subsection: "Didactic education that is mission specific and specific to scope of care....."

This was an editing error which will be addressed.

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**06.05.03 # 4, Page 6.9** The list should be the same as from the RW section but is missing "j"

j. The use of appropriate maintenance ladder stands/fall protection to provide access to the components on the aircraft without risk to the mechanic or damage to the aircraft are strongly encouraged."

This was an editing error, and the committee agrees that the RW and FW sections should be the same. Standard 05.05.03 paragraphs "H", "I" and "J" from the RW section will be copied and pasted into the FW section, 06.05.03.

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Date 01/23/2024 #9

Standard # - Suggested Change and Rationale for Change

**03.06.01 24. Page 3.36** What is the reason why vehicle temperatures are different? The same human beings are riding in both types of vehicles.

See response under # 10 below.

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Date 01/23/2024 #10

Standard # - Suggested Change and Rationale for Change

**03.06.01 24. Page 3.36,** What is the process to advocate for clarity in a standard? Specifically, 03.06.01 24. "The interior of the aircraft must be climate controlled to avoid adverse effects on patients and personnel on board.". This is a very vague standard. Here in Arizona, we are experiencing unprecedented heat. I have firsthand knowledge of carriers stating that "putting your hands out the window" counts as climate control. 03.06.01 24A does state "until temperatures are maintained within

the range of 50-95 degrees". I think the intention is very clear, that a system must be on the aircraft with the ability to control the climate to these parameters. I would like to know how a flight nurse, such as myself, would go about advocating for language that states something like "the interior of the aircraft must be climate controlled to maintain a cabin temperature range of 50-95 degrees"

Temperature ranges for the surface vehicle come for the federal KKK specification and are also required by several states. These are outlined in more details in the Reference section of the 12<sup>th</sup> Standards. There is very little written about temperature control ranges for air medical, particularly helicopters that may be left outside because there is no hangar. At the time the original Standard was written, there were many air medical helicopters without air conditioning. The CAMTS Board is a little less concerned about the actual temperature ranges and more about how the program records, tracks, trends and mitigates extremes. In the first draft of the 13<sup>th</sup> Edition we will change the word of the standard as recommended and propose one range for all vehicles. THIS IS ALL NEW WORDING. We will see what additional suggestions and comments we receive.

**03.06.01 24. To avoid adverse effects on patients and personnel on board, the interior of the vehicle cabin should be climate controlled to maintain a cabin temperature range of 68 – 78 degrees F (20.0 – 25.5 degrees C).**

- a. Thermometer is to be mounted inside the cabin. Electronic thermometers that record temperatures are encouraged.
- b. The program has written policies that address measures to be taken to avoid effects of temperature extremes on patients, crew, equipment, and medications on board.
- c. In the event cabin temperatures are less than 68 degrees F (20 degrees C) or greater than 78 degrees F (25.5 degrees C), the program requires documentation of mitigating actions and outcomes. These will be reviewed by the program QM process for trends and further improvement actions.
- d. For those transports meeting the definition of "long range", additional policies must be in place to address how adequate cabin temperature will be maintained during fueling and/or technical stops to ensure patient, crew, and passenger comfort.

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Date 01/23/2024 #11

Standard # - Suggested Change and Rationale for Change

**03.05.01 2. b Page 3.18** Open for discussion. Question asked: "We are pursuing CAMTS Accreditation for our pediatric ICU transport team. One questions we had was whether or not each member of the team (RN and RT) needed to be able to intubate or is acceptable for our team to have the capability of bringing a MD along when needed who is able to intubate and secure an airway?" Standard states "No less than 1 successful live, cadaver, HPS or static mannequin airway management experience per quarter is required for each provider, for each type of airway listed within the program protocols (endotracheal, supraglottic, nasal, etc.) and for each age group in scope of care." The way it is written, is the intent of the Standard to allow the management of an airway with supraglottic an/or bag/mask?

The committee agrees to leave the standard unchanged and that both members of a critical care transport team should be trained to the critical care level, which includes advanced airway skills for those patients

that are within their scope of care. This does not necessarily require endotracheal intubation if other advance airways (supraglottic) are in the scope of care, and the providers receive initial skills and quarterly competency verifications as outlined in the Standards.

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Date 01/23/2024 #12

Standard # - Suggested Change and Rationale for Change

Please include submission of data and membership in the ETHOS database as a requirement for CAMTS accreditation.

The committee believes support of the ETHOS data base is important and should be strongly encouraged, but some programs may resist for various reasons. For the 13<sup>th</sup> Edition the committee suggests the following addition:

**01.05.05 Programs are strongly encouraged to report, and keep current, their program information in the Emergency Transport Healthcare and Safety (ETHOS) data base. (<https://ethos.aams.org/>)**

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Date 01/25/2024 #13

Standard # - Suggested Change and Rationale for Change

All HAA operators should be required to fly aircraft with glass windscreens. It is not acceptable to damage or lose an aircraft or crew due to a bird strike. Weight and costs should not outweigh the survivability of an impact in the air.

The committee agrees this would be difficult to impossible to retrofit existing aircraft. Glass windscreens are heavier, require more superstructure, and may reduce the visual field for the pilot. Windscreen design is improving and helmets, with visors, are required within the standards.

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Date 01/25/2024 #14

Standard # - Suggested Change and Rationale for Change

**01.02.02 6. Page 1.2** Insurance For US operations conducting flights outside of the US, a customs bond appropriate to the size and type of aircraft in the amount that covers any unexpected costs based on port of entry. Comment: A Customs Bond must, by CBP regulation, be in the name of the operator. Can't be in the name of the medical provider. Need to reword.

The committee agrees to change the wording to:

**01.02.02 6.** Insurance For U.S. operations conducting flights outside of the US, a customs bond, **in the name of the operator**, appropriate to the size and type of aircraft in the amount that covers any unexpected costs based on port of entry.

**01.04.02 Page 1.4** Conflict of Interest The BOD, administrative and management staff are encouraged to complete an annual conflict of interest statement or form disclosing any actual or potential conflicts. Comment: Does an operator/vendor need this, and if so, why? If you are the vendor for multiple CAMTS accredited programs isn't that an instant conflict? Need to reword this.

The committee agrees the completion of a conflict-of-interest statement does not preclude one from doing business, it just exposes explicit or implicit conflicts. We also received a comment to the same

Standard in comment #21 and the committee agrees this should be moved from encouraged to required. The standard will be reworded to:

**01.04.02** Conflict of Interest The BOD, administrative and management staff are ~~encouraged~~ **required** to complete an annual conflict of interest statement or form disclosing any actual or potential conflicts.

**01.05.01 12 Page 1.7** TSA No fly Verification of patient/passenger identifications against TSA no fly list or applicable national regulations. Comment: I sent written documentation to remove requirements related to the TSA and the 12-5 program because it doesn't apply to medical transports. I think this standard slipped through. I understand a few operators are claiming their TSA reps say this is required for the passengers, but that doesn't make them correct. Our TSA rep says we can't use the No-Fly List for this purpose, so now I'm in a bind. This needs to be removed asap.

**The committee suggested we reach out to the TSA for clear direction. We will attempt to gather more information. This remains open.**

(Also being reviewed by the Aviation Advisory Committee)

November 2024 update: The CAMTS Office did reach out to TSA and contacted the Attorney General for TSA. We have received no response. This was also reviewed by the Aviation Advisory Committee and they recommended we delete this Standard. In December 2024 the Standards committee agreed to delete the No Fly Verification requirement.

**01.05.01. 13.a page 1.7** FCPA "For FW International as applicable to the program's scope of services and service locations. a. Foreign Corrupt Practice Act (FCPA) 1. There is a policy that addresses how the program maintains compliance with the foreign corrupt practice act (FCPA) and monitors for transactions 2. Personnel are trained on the FCPA and ensure that all expenditures, transactions, ADDING a Standard and the Rationale.: dispositions, and payments involving program funds or assets are properly and accurately recorded in program's financial records 3. All payments made with program funds, or on behalf of the program, must be properly authorized. No undisclosed or unrecorded accounts are to be established for any purpose." Comment: If CAMTS accredits medical providers and therefore relies on the FAA for the aviations regulations, why is CAMTS involved in this? I don't think this is something that CAMTS needs to be involved in. Site Surveyors aren't going to understand it, nor do I think they need to.

The committee agrees not to make a change. CAMTS does not just address medical providers, but the entire program. The site surveyors for a specific program are selected based on their prior experience, so not all site surveyors need to be knowledgeable in every detail of every standard and not all standards are reviewed in every site survey. Some Standards are included to support improved patient care and/or safety and maybe be referenced if there are concerns.

(Also being reviewed by the Aviation Advisory Committee)

November 2024 update: This was also reviewed by the Aviation Advisory Committee and they recommended we delete this Standard because it is already a legal requirement. In December 2024 the Standards committee agreed to delete this Standard.

**01.05.01. 13.b page 1.7** "b. General Data Protection Regulation (GDPR), UK Protection Act (FW International) 1. Determine if the transport will initiate, travel through, or terminate in an EU/UK country. 2. Limit the amount of information gathered prior to obtaining a signed Consent form. 3. Obtain a signed Consent form prior to disclosing patient information to any other parties. 4. When personal data has not been obtained directly from the data subject, document the identity and contact details of the person providing the data, why it was obtained indirectly, and for what purpose it is to be used (i.e. providing a quote for transport). 5. Retain the consent and any other documentation with the flight paperwork." Comment: Same as above

The committee agrees not to make a change. CAMTS does not just address medical providers, but the entire program and the standards apply to a number of programs who provide international services. The site surveyors for a specific program are selected based on their prior experience, so not all site surveyors need to be knowledgeable in every detail of every standard and not all standards are reviewed in every site survey. Some Standards are included to support improved patient care and/or safety and be referenced if there are concerns.

(Also being reviewed by the Aviation Advisory Committee)

**02.03.07 .2. g. Page 2.14** "g. For international transports • An international checklist is available that includes information about specific locations, use of medical assistance companies, networking and local handlers. • Repatriation insurance, ICAO (International Civil Aviation Organization) regulations • Crew Safety – Policies address crew safety, including o Cultural intelligence o Assess travel risk to other countries and immunization recommendations using a reliable source (for example, the U.S. Department of State and CDC respectively and WHO)." Comment: I'm not necessarily opposed to this standard, but I think CAMTS should publish some sort of example or guide to give operators, and more importantly site surveyors, something to go by. JLI has an international checklist, but its aviation focused and doesn't cover some of this, nor should it. This would mean a second checklist, so who addresses it and is it kept? If so, how long?

The committee agrees that the use of an international checklist is imperative and should even include more preparedness information than those outlined here. For now, the committee agrees to make not changes, but allow the program to determine the details on the checklist based on the areas they service. We will, however, look for examples we can include in the next issue of "Best Practices".

(Also being reviewed by the Aviation Advisory Committee)

November 2024 update: The Aviation Advisory Committee to support this Standard and recommends no changes.

**02.03.07 2. k Page 2.17** Individual survival gear carried on each crew member is strongly encouraged. At a minimum, the gear should include an appropriate signaling device. Comment: This should not apply to all FW. I think this is gross over thinking.

The committee agrees of make no change to the standard. As explained in the standard this is "strongly encouraged" and not required and the only item specified is a signaling device. The type of signaling device is specifically not defined and may include a signaling mirror, flare, orange ribbon, strobe, or even a pen light.



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Date 01/25/2024 #15

Standard # - Suggested Change and Rationale for Change

**06.04.03 Page 6.4** As an alternative to the flight hours in 06.04.03 1. and 2., a program may develop and submit a Pilot in Command (PIC) Experience Evaluation Tool. The tool should evaluate a pilot's education, training, and experience to determine if that pilot has the necessary background and experience to be a safe and effective PIC, taking into consideration the program's operation needs, scope of serve, service area, airframe type, operational environment, etc. To be considered as an alternative to meeting the Standard the program must submit a CAMTS Class Two Report of Change along with the Evaluation Tool. Once accepted, the effectiveness of the tool must be evaluated as part of the program's quality management process. The tool will be specific to the program, however an example that can be used as a starting point can be found in Addenda C. Comment: I think your evaluation checklist is a good start, but we need a process. The aviation subcommittee needs to step up and handle these evaluations and make a recommendation to the site surveyor(s), IMO.

The Aviation Advisory Committee does review each submitted evaluation tool and provides the program with suggestions. The site surveyors are not involved in these initial evaluations, however in subsequent visits they should be looking to see if the program made any of the recommended changes. This will be referred to the Aviation Advisory Committee for review.

November 2024 update: The Aviation Advisory Committee reported they had much discussion about how to verify programs who submitted their risk tools, were evaluation pilot performance, who were hired under the criteria in h risk tool during subsequent site visits. As of November 2024, the subcommittee has thus far accepted 12 risk tools with recommendations that were sent back to the operators. There was discussion about how to follow up in subsequent site visits to ensure the programs' QM is evaluating the outcomes of pilots hired under this new process. The CAMTS office is developing a checklist of the programs that have accepted tools so site surveyors have access to that information during the next site survey. This alternative process began in 2023 so the first programs to apply for this hours vs risk tool process will be re-evaluated in 2026.

**06.05.01.4 Page 6.8 4.** There is an annual review of infection exposure control, medical systems and installations on the aircraft, patient loading and unloading procedures for all mechanics. Comment: We really need to clear up to whom this applies. Every mechanic, or just employees of the operator?

Outsourced repair stations?

For additional clarity, the committee agrees to the following wording change:

**06.05.01.4** There is an annual review of infection exposure control, medical systems and installations on the aircraft, patient loading and unloading ~~procedures~~ **systems and equipment** for all ~~program~~ **mechanics**.

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Date 01/25/2024 #16

Standard # - Suggested Change and Rationale for Change

**03.05.01 1. d Page 3.16** Excerpts taken from a longer letter: CAMTS' Current Accreditation Standards Allow Animal Use Section 03.05.01(1)(d) of CAMTS' 12th edition "Accreditation Standards" states that "animal labs are also acceptable," in reference to the five successful airway management experiences

required for providers. 2 There are numerous non-animal training methods—such as cadavers or human patient simulators (HPS), both of which CAMTS approves of in its standards—that are available for completing airway management training. Comments: Based on the information presented below, we request that the Commission on Accreditation of Medical Transport Systems (CAMTS) amend its Accreditation Standards to explicitly prohibit the use of animals in training, education, and certification in favor of human-relevant simulations at all member medical transport organizations—a policy that would align with CAMTS’ core values of being “Fair, Ethical, Consistent, Accountable, and Patient and Safety Focused.” Based on the aforementioned information, we urge CAMTS to add explicit policy language to its Accreditation Standards to prohibit the use of animals in training, education, and certification. Our suggested public policy language is, “CAMTS Accreditation Standards prohibit the use of animals for all associated trainings, education, and certifications, and instead require accredited programs to exclusively use human cadavers, human patient simulators, and other non-animal methods.”

The committee strongly believes the standard should remain unchanged. While many programs have moved to primarily simulation, animal labs are still an excellent way to train when there is no regular/easy access to human cadaver labs. Discouraging animal labs would decrease quality training opportunities, which are in very short supply already. For the most part, animals used for training are classified as “food products” and when live animals are used, a veterinarian is often present or is involved in setting training and animal care parameters.

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Date 02/08/2024 #17

Standard # - Suggested Change and Rationale for Change

**01.06.02, 2., Page 1.10** Currently states "A policy requires staff to self-report any investigation, arrest or convictions" I suggest changing the wording to: "A policy requires staff to self-report any investigations, arrest, convictions, or licensure sanctions and/or other actions that may impact their ability to perform their role."

The committee agrees to the change. The standard will be changed to:

**01.06.02, 2. A policy requires staff to self-report any investigations, arrests, convictions, licensure, or certification sanctions.**

**03.06.01, 25, Page 3.37** Suggest changing the wording to: "Crews have life preservers easily accessible for operations over water. As an alternative, rotorcraft must remain within auto rotation of the shoreline." I think this should no longer just be "strongly encouraged" and should also apply to FW and surface (boats).

This is being referred to the Aviation Advisory Committee for comments.

November 2024 update: The Aviation Advisory Committee recommends deleting this Standard as it is already required under FAR Part 135.167 and 135.168. In December 2024, the Standard Committee agreed to delete this Standard.

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Date 02/08/2024 #18

Standard # - Suggested Change and Rationale for Change

**01.09.01 Page 1.14 Meeting minutes:** The current standards basically require written meeting minutes; however, more and more hospitals and programs are moving to electronic capture of the meetings. There should be consideration to change the wording in this section to allow for electronic recording and of the meeting minutes. Many programs are also moving to using PowerPoints as their meeting documentation.

The committee agrees to not change the standards. Meeting minutes are designed to be a summary of the key discussions, actions, and follow-up. Written documentation needs to include those in attendance, by name and title, discussions, actions and follow-up and loop closure, without having to sit through a video or audio copy. PowerPoint presentations may meet this standard if attendance is included, notes are added with content of discussions, decisions, action items, assignments, and follow-up.

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Date XX/XX/2024 #19

Standard # - Suggested Change and Rationale for Change

Left Blank – **No comment**

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Date XX/XX/2024 #20

Standard # - Suggested Change and Rationale for Change

Left Blank – **No comment**

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Date 04/05/2024 #21

Standard # - Suggested Change and Rationale for Change

Current standard states: "The Board of Directors, administrative and management staff are encouraged to complete an annual conflict-of interest statement or form, disclosing and actual or potential conflicts."

**01.04.02, Page 1.3** - change "encouraged" to "required". This is standard ethical business practice.

The committee agrees the completion of a conflict-of-interest statement does not preclude one from doing business, it just exposes explicit or implicit conflicts. We also received a comment to the same Standard in comment #14 and the committee agrees this should be moved from encouraged to required. The standard will be reworded to:

**01.04.02 Page 1.4** Conflict of Interest The BOD, administrative and management staff are **encouraged required** to complete an annual conflict of interest statement or form disclosing any actual or potential conflicts.

**01.02.01, Better under 02.03.07, 2.d, Page 2.13** - reflective material or piping on helmets for RW crew who engage routinely in overwater operations. This is routine for over-water RW aircrew in Coast Guard and US Navy. While benefit may be somewhat small (thankfully very few crashes and even fewer over-water), has been found in Navy investigations to decrease time to identify aircrew occupants separated from their aircraft. No downside, with potential upside.

This suggestion was proposed during the last edition but was not included because of the concern of reflective materials covering cracks in the helmet shells during helmet inspections. We reached out to several Navy and Coast Guard pilots, and they encouraged the use of reflective strips. We received this response from CWO3 Jason Nix, ALSE/GSE MANAGER, USCG Office of Aeronautical Engineering (CG-41)

“The CG for the most part has always used the reflective tape on our helmets. We apply 3 1’x16’ strips on the helmets for the very same reason you mentioned. The tape for the most part is easy enough to remove if the user has suspicion that there may be a crack. We typically conduct a thorough inspection yearly, but the user does a visual inspection before each flight.

For the most part, cracks are rare on our helmets unless the user banged their head or dropped the helmet. In those cases, I would remove the tape and re-apply after inspection and using rubbing alcohol to clean tape residue.

As far as manuals, we use our internal guidance on helmet inspections, but it is basically a thorough visual inspection of the entire helmet. If we find any discrepancies that can’t be fixed by a part replacement, then we just issue a new helmet. We do work in a saltwater environment, so most issues occur with comms parts and degraded inserts.”

Another Coast Guard pilot stated that inspections for cracks can also be done by removing the web and padding and inspecting from the inside of the helmet. He also pointed that adding the reflective materials is not much different for added Velcro for the NVGs

The committee agreed to include the wording that was removed at the last minute from the 12<sup>th</sup> editions. The size, shape, and extent of the reflective materials is left to the program. The standard will state:

02.03.09 2. d Head Strike Envelope

- **Helmets have reflective striping or other markings that can be seen in the event the wearer is in the water or other environments requiring search and rescue**

(Also being reviewed by the Aviation Advisory Committee)

November 2024 update: The Aviation Advisory Committee has no conclusive suggestions. Some on committee believe reflection interferes with NVGs but others see it as over and above and maybe an example to exceed the standards. CAMTS staff spoke to three helmet and one NVG manufacture and they all state that the reflective materials do not interfere with either the NVG or with helmet inspections. We also spoke with several pilots (military, air medical, search, and law enforcement) that currently use reflective materials and they are strongly supportive in its use, pointing out increased visibility on the ground as well as an aid in search and rescue. In the December 2024 Standard Committee meeting the committee agreed to leave the proposed Standard as written.

**03.07.01 #7. Page 3.38:** Remove requirement for annual TB testing. No longer required anywhere in the United States.

The committee agrees with the existing standard, however, believes there could be more clarification.

The wording will be changed to:

**03.07.01 # 7. Programs conducting international transports or operating in localized regions determined at high risk for tuberculosis, must provide annual tuberculosis testing (purified protein derivative), as consistent with current and other testing, screening, and vaccinations, and as consistent with current national guidelines (such as the WHO, CDC, AHJ). This includes medical personnel, pilots, and mechanics.**

**01.05.01 #7, Page 1.6** - transport organization is not beholden to EMTALA, it is the sending ER that is responsible. There is no requirement and there is no power inherent to the transport organization to alter and consider this. It is a source of wide-spread confusion in transport organizations, primarily, again since there is no specific mandate for the transport organization itself. Would remove

The committee agrees to leave the standard unchanged. While EMTALA may not apply to some programs, it might apply to others. Regardless, the committee believes all program personnel should understand EMTALA concepts and requirements.

Same with **03.02.12., Page 3.10** This is not a reasonable ask of a transport organization to police the sending hospital compliance. Would remove.

The committee agrees to leave the standard unchanged. While EMTALA may not apply to some programs, it might apply to others. Regardless, the committee believes all program personnel should understand EMTALA concepts and requirements.

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Date 04/16/2024 #22

Standard # - Suggested Change and Rationale for Change

**03.01.03 (2)(a), Page 3.4** - Can we please clarify primary provider experiential requirements? Either pick a timeframe (i.e., 3 years) or an hourly requirement (i.e., 4000 hours), but not both, since they do not agree with each other. Standard full-time employment is between 1872 (0.9 FTE) to 2080 (1.0 FTE) hours per year, meaning 4000 hours is around 2 years of FT experience (+/- based on FTE status). If 4000 hours is all that is required, we could bring candidates with FT experience in an entire year earlier at 2 years; if we need to wait 3 years, I suggest increasing the hourly requirement to between 5,000 to 6,000 hours to account for 3 years of actual FT practice. Alternatively, remove the "years" requirement altogether and just set an hourly requirement, since that is a more objective way to measure someone's experience regardless of their FTE during that timeframe.

The committee agrees the wording can be confusing and will change as below.

03.01.03 2. a. The primary care provider of the clinical care crew may be a resident or staff physician, advanced practice nurse, registered nurse, physician assistant, or a paramedic. The primary care provider must have 3 full time equivalent years of critical care experience. (Critical care experience is defined as ~~not less than 4000 hours~~ experience in an ICU or an emergency department.) In addition, clinicians in the primary-care-provider role must have pre-hire experience and/or education in the medications and interventions as defined in the program's scope of care and services.

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Date 04/24/2024 #23

Standard # - Suggested Change and Rationale for Change

**01.08.01 4. b, Page 1.13 - Reflective vest.**

The current wording implies that safety vests are optional during the day and only required at night. OSHA Standard 1926.651(d) states: "Employees exposed to public vehicular traffic shall be provided with, and shall wear, warning vests or other suitable garments marked with or made of reflectorized or high-visibility material." I suggest leaving the existing wording in the Standards but delete the word "night"

The committee agrees and will delete the word "night". The new wording will read:

01.08.01 4. b. High-visibility reflective vests or appropriate Department of Transportation (DOT) approved clothing worn by flight and ambulance crews in accordance with ANSI-SEA 107 standard or equivalent national standard (required for medical crews and vehicle operators responding to ~~night~~ scene requests).

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Date 04/27/2024 #24

Standard # - Suggested Change and Rationale for Change

Move the entire standard **04.08.04** regarding PAIP to the 02.03.00 safety management section, suggest to new standard numbered 02.03.08. Too often the medical transport systems consider PAIP a responsibility of the communications center and then, too often PAIPs are not completed, in some cases because of poor support from management. Moving this standard under safety is appropriate since PAIP drills represent a safety item and also elevates it to the safety department responsibility, where I believe it will be completed more consistently since we all say, "safety first".

The committee agrees the Post Accident/Incident Plan section is more than a communication center responsibility and this entire standard 04.08.04 is better positioned within the safety standards. The committee also agreed to add the wording "or Emergency Response Plan". This will be moved and become 02.03.08.

Move standard **04.08.06** regarding participation in regional disaster preparedness drills to the first sentence of 1. under 03.05.03 Community Outreach Safety Program as the participation in regional drills is not a function of the communication center, but a function of the entire medical transport system as a whole, and this section already speaks to involvement in regional disasters.

The committee agrees this standard is better positioned under the Community Outreach Safety Program and will be moved to 03.05.03.

Three-part suggestion. Time to move **03.02.02 10**. Just Culture for physician medical directors to be required rather than strongly encouraged. Add in, "(at least every three years)" to this requirement as once every three years is both reasonable and consistent with other medical director requirements. Consider adding the language, "or equivalent" because just culture is a component of High Reliability Organization (HRO) training, which is a hospital requirement of many physicians (unless you think it is unique enough, then leave this last suggestion out).

The committee agrees with this change and will make the following wording changes:

03.03.02 10. "Just Culture" and "Informed Culture" or equivalent education ~~is strongly encouraged~~ **(at least every three years)** (see References).

Time to move **03.02.08** safety and risk management training for physician medical directors to be required.

The committee agrees with this change and will make the following wording changes:

03.02.08 The medical director(s) receives safety and risk management training on an annual basis ~~(strongly encouraged)~~.

Three-part suggestion. Move **03.02.09** regarding medical directors orienting physicians that provide on-line medical control to the 03.02.14 Medical Control section as the last sentence of 1. because as a stand-alone, 03.02.09 is duplicative and has different language. Specify this orientation requirement for on-line physicians, "at least every 3 years" because there may not be yearly changes to discuss but likely within three years, something important will have changed that on-line medical direction needs. Change the name of this whole section from, "Medical Control" to, "On-Line Medical Direction" which is the language that NAEMSP uses and then change, "medical control" to, "medical consult" throughout this section.

The committee agrees with this change but also believes that orientations or updates should be more frequent if changes are made to the programs protocols or policies that impact patient care.

Standard 03.02.09 will be moved and become part of Standard 03.02.14 and that section will be retitled and part renumbered. We will make the following wording changes:

**03.02.14 ~~Medical Control~~ On-Line Medical Direction**

1. The medical director(s) is actively involved in orienting physicians providing on-line (in-transport) medical direction according to the policies, procedures, and patient care protocols of the medical transport services. **Periodic updates will be provided whenever there are changes to the protocols or program policies that may impact patient care.**

**2. ~~Medical Control~~ On-Line Medical Direction** Physicians- On-line medical ~~control~~ direction physicians who are trained and identified by the service must be available 24/7/365 and have the appropriate knowledge base and experience sufficient to ensure proper medical care and medical control during transport for all patient types served by the medical transport service.

**3.** If the medical ~~control~~ direction physician's experience is lacking in a clinical area, he or she must seek prompt consultation as appropriate to ensure proper medical care and medical control during transport for all patient types served by the medical transport service. This consultant should be an appropriate designated physician or the patient's receiving attending physician.

**4.** Medical ~~control~~ direction physicians are provided with triage guidelines to determine appropriate transport mode and team composition, and on-scene triage guidelines developed and accepted by the specific EMS region. See References. (RW)

a. Triage guidelines may include provisions for auto launch if part of the scope of service

Time to move **03.03.06 4.** just culture for the clinical care supervisor and **03.04.01 2.** just culture for the program manager to required. Time to move 03.03.06 15. safety and risk management training for the clinical care supervisor and 03.04.01 5. safety and risk management training for the program manager to required.

The committee agrees and will change the wording:

03.03.06

4. "Just Culture" or equivalent education ~~(strongly encouraged)~~

03.04.01

2. "Just Culture" or equivalent education ~~(strongly encouraged)~~

5. Safety and risk management training on an annual basis ~~(strongly encouraged)~~

Time to move **03.06.01 5.** a. regarding seated position in ambulance while managing airways from strongly encouraged to required as we don't want our medical providers unbuckling in a moving vehicle.

The committee agrees and will change the wording:

03.06.01 5.

a. ~~In an ambulance it is strongly encouraged that seating be designed in the ambulance~~  
**Ambulance seating shall be designed** so that patient care can be rendered from a seat-belted position. Use of shoulder harnesses on side facing bench seats are discouraged based on peer reviewed studies regarding front end collisions. (See References) (S)

Edit: remove the bold from the number 9. under 03.03.06

Thank you for catching this typo.

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Date 05/21/2024 #25

Standard # - Suggested Change and Rationale for Change

**03.05.01 2. b, Page 3.18** (and others). The current standard states "Clinical and laboratory continuing education must be developed and documented on an annual basis as pertinent to scope of care to follow." Many programs have moved away from annual clinical rotations and/or HPS and are using actual patient transports to account for clinical rotations. While the program may have written objectives there is no third party to acknowledge the objectives were met or that the patient care was appropriate. (Must be OK if the patient did not deteriorate?) I suggest the committee address and clarify what is acceptable evaluation on annual clinical rotations.

This suggestion is being referred to the CAMTS Education Committee. The Standards Committee believes with clearly defined clinical objectives, documentation completing the objectives for each clinical area on an annual basis, and close quality review may meet this standard.

**03.05.01 3. Page 3.18** Competencies - Second sentence currently reads "Where available for the role and patient population(s) transported. a transport-specific certification is strongly encouraged." Suggest changing this to "required".

The committee agrees and the wording will be changed to:



Where available for the role and patient population(s) transported. a transport-specific certification is ~~strongly encouraged~~ **required**.

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Date 05/21/2024 #26

Standard # - Suggested Change and Rationale for Change

**06.04.03, Item 5:** "Ground" used in this context is not standard phraseology and not familiar.

This was an editing error. The word should have been "green".

**06.04.03, Item 5:** This standard specifies that two pilots working together must have 250 hours in M/M between the two of them. However, single pilot operations have no such requirement. An operator, in this scenario, could elect to exceed the standard by using two pilots in an aircraft certificated for single pilot operations but would have more restrictions than if they were operating the aircraft single pilot. Furthermore, it is very difficult for an SIC to log time in an aircraft certificated for single pilot operations. Recommend changing this standard to only apply to aircraft REQUIRING two pilot operations (predominantly part 25)

The committee agreed to make no changes to the standard.

(Also being reviewed by the Aviation Advisory Committee)

November 2024 update: The Aviation Advisory Committee agrees with this standards and recommends no changes to the Standard.

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Date 06/06/2024 #27

Standard # - Suggested Change and Rationale for Change

**3.05.01 3. f, g, and h** - Make consistent and similar language across RN/Paramedic/RT. C-NPT is required for RNs but recommended for Paramedics and RTs. It should be encouraged for all disciplines, but not required.

The committee agreed to make no change to the standard.

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In the following submission (#28), the text in black is the recommendation along with the committee response. The very lengthy rationales were shared with Standards Committee but for brevity they are not listed here.

Date 06/11/2024 #28

Standard # - Suggested Change and Rationale for Change

**New Standard:** Program administration will demonstrate execution of their duties and responsibilities including addressing major issues within a reasonable time period, following basic problem solving principles, executing sound business decisions, demonstrating financial responsibility, heeding facts, data and expertise, and demonstrating competency, integrity, professionalism, and leadership that supports the quality and safety standards of CAMTS. Program administration will provide adequate resources to effectively operate the program including promoting recruitment and retention

The committee believes that these are primarily human resources issues and are covered under other existing standards. Issues within surveyed program are likely to highlighted in the comments and scores

of the Safety Culture Survey and can then be tied back to an existing Standard. The committee believes no changes to the existing standards are needed.

**New Standard:** Vehicles will be in service at least 80% of the time.

In-service times cannot be guaranteed and may be impacted by many issues outside the control of the program. This is covered under Standard 01.02.02 on Financial Commitment and should also be included as part of the program's quality management process, especially if vehicle or equipment availability or maintenance is an issue. These are likely to be shown in the Safety Culture Survey results. The committee agrees to no changes in the Standards.

**New Standard:** There will be written policies addressing hiring and supervision of the communication specialists if these individuals are not employed by the program. If not employed by the program, there will be a direct reporting line of the communications specialist supervisor to the program's senior management. All communications specialist supervisors will have knowledge and experience commensurate to the mission, for example, at minimum a paramedic for critical care and at least two years of experience in medical transport.

The committee agrees this appears to be a program specific issue. There are many configurations of communication centers and staffing. With appropriate training of the communication specialists, programs have shown staffing coverage can be done without requiring clinical certification. The committee agrees to make no changes to the Standards.

**04.03.01. 2.b.** There are relief personnel with the appropriate training available for periodic breaks.

Suggest amending to: There are relief personnel with equivalent training immediately available for periodic breaks, employee emergencies/mid shift vacancies and/or surges in activity from fellow communications specialists, the communication specialist supervisor, or another

The committee believes this is already covered in the communication center and financial commitment standards. The committee agrees to no further changes to the Standards.

**The number of management positions** must be appropriate to the mission, scope, vehicle configuration, volume and complexity of the program.

The committee believes that these are primarily human resources issues and are covered under other existing standards. Issues within surveyed program are likely to be highlighted in the comments and scores of the Safety Culture Survey and can then be tied back to an existing Standard. The committee believes no changes to the existing standards are needed.

**01.06.04** Replace "are encouraged to" with "will" in the standard: "Programs are encouraged to develop a plan for succession and unanticipated extended absence for key positions. The plan should address position vacancies, including when there is no incumbent to provide transition training, as well as unplanned extended temporary absences, designed to preserve the integrity of the program."

The committee believes that these are primarily human resources issues and are covered under other existing standards. Issues within the program are likely to be highlighted in the comments and scores of the

Safety Culture Survey. The committee believes, for the 13<sup>th</sup> Edition “encourage” is still appropriate and no changes to the existing standards are needed.

**01.02.01** Add "including market pay practices" as follows: There must be evidence of financial commitment to the program by the administrative structure including market pay practices and through financial resources that provide excellence in patient care and safety of the transport environment  
The standards committee believes this is outside the scope of CAMTS and is primarily an internal human resource issues. No changes to the standards.

**03.06.01 8.g.** There is a policy to monitor individual nurse/practitioner use of controlled substances to detect/alert management of possible controlled substance diversion.

The committee agrees with this recommendation and believes it is best placed under both initial and annual training for both clinical and management staff. The following changes will be made:

**03.03.06** The clinical care supervisor must demonstrate currency in the following or equivalent educational experiences as appropriate to the mission statement and scope of care and/or the clinical care supervisor must have immediate access to personnel with appropriate knowledge and experience as consultants. Education on didactic topics is on an annual basis.

**10. Identification and response to actual or suspected medication diversion. (*also results in new numbering*)**

**03.04.01** The program manager must demonstrate currency in the following or equivalent educational experiences as appropriate to the mission statement and scope of care. Didactic education initially and on an annual basis must include but not be limited to:

**5. Identification and response to actual or suspected medication diversion. (*also results in new numbering*)**

**03.05.01**

2. Continuing education/staff development must be provided and documented for all full-time and part-time Critical Care and ALS Providers. These must be specific and appropriate for the mission statement and scope of care of the medical transport service.

a. Didactic continuing education must include an annual review of:

- Human factors – Crew Resource Management - AMRM (Air Medical Resource Management) (See References)
- Exposure control
- “Just Culture” or equivalent education – strongly encouraged.

- Safety and risk management training on an annual basis (strongly encouraged)
- Sleep deprivation, sleep inertia, circadian rhythms and recognizing signs of fatigue
- Identification and response to actual or suspected medication diversion.
- State EMS rules and regulations regarding surface and air transport
- Stress recognition and management/resilience

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Date 06/21/2024 #29

Standard # - Suggested Change and Rationale for Change

**03.05.01 (3)(f) page 3.16** - For Specialty Team i.e. Neonatal and High-Risk OB (Our Program has a Perinatal Specialty Team that does High-Risk OB & Neonatal Transports (Team combo OB Flight RN, Neonatal NICU Flight RN, & NICU Flight RT). With the current standard by Jan. 2025 our Specialty RNs would need to have a flight-specific advanced level cert., such as CNPT (or plan in place to have all RNs to get the C-NPT). Currently, all our Specialty RN's have their RNC-OB/RNC-EFM or RNC-NIC. With the current standard, they would be required to get C-NPT ... We feel that the RNC-NIC and RNC-OB/RNC-EFM are more valuable to our RN's than the C-NPT would be... First, the RNC's relates to their specialty patient population for the specialty team, and second, the C-NPT has far fewer eligibility requirements to be able to take the exam than do the specialty RNC's exam's eligibility requirements. Thanks for taking the time to address this!

The committee agreed to make no changes to this standard. The specialty certifications above are great for in-hospital patient care, but do not address patient transport specific content that is an expansion to the hospital role.

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Date 06/24/2024 #30

Standard # - Suggested Change and Rationale for Change

**01.07.01** to correct an inconsistency - Standard discusses scheduling, individual work shifts, strategies to minimize fatigue, # of shifts/wk and day to night rotations. 1. under this general standard addresses shifts scheduled for more than 12 hours but d. in this section addresses the right to call "Time Out" regardless of shift length. I suggest we move 1.d. to number 1 and relabel criteria for shifts scheduled more than 12 hours as 2 (leaving a, b, c, e and f) and renumber the following entries as necessary.

The committee agrees and will change the wording and numbering.

**01.07.01** Scheduling and individual work schedules demonstrate strategies to minimize duty-time fatigue, length of shift, number of shifts per week and day-to-night rotation. (See References for circadian rhythm, Fatigue Risk Management System (FRMS) and other fatigue studies.)

**1. ~~d. Medical~~ Personnel must have the right to call “time out” and be granted a reasonable rest period if the team member (or fellow team member) determines that he or she is unfit or unsafe to continue duty, no matter what the shift length. There must be no adverse personnel action or undue pressure to continue in this circumstance.**

**a. Management must monitor transport volumes and personnel’s use of a “time out” policy.**

**b. A fatigue-risk management system is utilized.**

**12. The following criteria must be met for shifts scheduled more than 12 hours.**

a. Medical personnel are not required to routinely perform any duties beyond those associated with the transport service.

b. Medical personnel are provided with access to and permission for uninterrupted rest after daily medical personnel duties are met.

c. The physical base of operations includes an appropriate place for uninterrupted rest.

(This will also change the numbering of the remaining section.)

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Date 07/25/24/2024 #31

Standard # - Suggested Change and Rationale for Change

Definition of Neonatal Transport: Should take into account corrected gestational age. Recommend consideration of corrected gestational age (<= 44weeks) or <28 days of life if term or post term.

28 days of life on a VLBW or ELBW infant is too soon to opt for transport without neonatal experience and equipment.

**This was referred to our AAP and NAAN representatives for comment.**

From Robert Holcomb, MD, AAP: *“Agree 100%. In Itasca, Dick and I talked a little about this. All too often these EMS services claim to do neonatal transports and yet don’t even have a transport isolette. As we move towards ensuring the true critical care neonatal transports are accomplished by specialty teams, this is a great step in that direction”.*

From Tammy Rush, NAAN: *“So very important in tracking development especially when born premature. Please consider adding Corrected Gestational Age.”*

From Linda Meiner: *“ I have always supported this but we had trouble obtaining corrected gestational age on the neonates and little things that showed up in ED's so we started using the following to define a neonatal transport:*

*The infant is 30 days or less OR if the infant weighs 5kg (or 10lbs) or less OR if the infant is still being cared for in a NICU.*

*This simplified the question for our callers, most can answer chronological age and weight on the initial requesting call - used this for over 40 years and there is a little grey zone in the upper margins but it works well to match team and patient needs."*

We also reached out to the person that submitted the suggestion to ask if they were speaking more toward the team or the use of an isolette. His response: *"Actually both. While the isolette is required for temperature stabilization, that is only a small part of the more complex issues presented by premature infants. This is also complicated by the needs of infants with severe BPD, who require ventilator settings far from the norm.*

*I think that the use of specialty teams for special patients needs to be a national standard, rather than a preference."*

The committee believes that the program needs to establish a policy on their criteria for using an isolette and/or specialty team(s). We will add the following wording to 01.04.06:

**01.04.06** All patient care resources, including personnel and equipment, necessary to the program's mission must be readily available in the transport vehicle or available to place in the transport vehicle, and they must be operational prior to initiating the mission. This includes resources, personnel, and equipment provided by Specialty Care Providers.

- 1. If within the program's scope of services, the program will have a policy that defines neonatal patients and when an isolette and/or specialty team will be used on transports.**

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Date 07/31/24/2024 #32

Standard # - Suggested Change and Rationale for Change

**03.01.02 - 3. and 03.01.03 - 3** - Medical Director: Add "Strongly Encourage" EMS Board Certification for Medical Director requirements.

With increased availability of specialty training in EMS for physicians, this background is increasingly becoming the standard. I would not make it a requirement, but it certainly is something newer medical directors should strive for or have in their background.

The committee agrees and the wording will be changed to:

**03.01.02 3. The medical director should be board-certified in emergency medicine. Board certification in Emergency Medical Services is strongly encouraged. ~~but~~ If he or she is not, it is strongly recommended that the medical director be board-certified in critical care, family medicine, internal medicine, surgery, or pediatrics with demonstrated EMS education or 5 years of experience in emergency medicine.**

**03.01.02 - 4. Equipment:** Add "Strongly Encourage" Video laryngoscope" . The evidence strongly points to VL as the preferred approach when using standard metrics of success (first pass success, lack of hypoxia, time to intubation, etc...). This is especially true in "low frequency intubators" which includes all EMS by definition. I think it will take time for the industry to transition as a whole, so strongly encouraged seems appropriate with this version.

The committee agrees and will make the following change related to ALS equipment:

03.01.02. 4. Equipment – includes all equipment in BLS, plus:

- a. Video laryngoscope (strongly encouraged)**
- b. Ventilation:** Ventilators and non-invasive ventilators (CPAP/ Bilevel Positive airway Pressure) with the capability to utilize blended gases
- c. Cardiac monitoring, pacemaker, and defibrillator**
- d. Non-invasive monitoring (e.g., waveform capnography, pulse-oximetry)**

**03.01.03 - 4. Equipment:** Add "Video Laryngoscope and blades appropriate for the scope of patient care" as required. See above rationale. CCT teams are typically better resourced and more nimble and should be able to make this transition (and probably should have already)

The committee agrees and will make the following change related to ALS equipment:

03.01.03. 4. Equipment – includes all equipment in BLS and ALS, plus:

- a. Video laryngoscope and blades appropriate for the scope of patient care**
- ab. Ventilation:** Multimodality ventilators capable of invasive ventilation (pressure, volume, ventilator appropriate to all age groups transported)
- bc. Invasive hemodynamic monitoring, central venous pressure, and arterial pressure**

**03.01.04 Specialty Care: 4/a:** Remove Transcutaneous Ventricular Assist Device. No service carries their own VADs. Management? Yes, but carrying the equipment is not useful or realistic.

The committee agrees and will delete this item:

03.01.04 4. Equipment - Includes all equipment in BLS, ALS, and Critical Care plus: (as appropriate to the scope of care)

~~**a. Transcutaneous ventricular assist devices (e.g. LVAD, BiVAD, RVAD)**~~

~~**ab. Inhaled gases (e.g., nitric oxide, helium oxygen, aerosolized prostacyclin)**~~

~~**bc. Neonatal isolette with heart rate monitoring device and size appropriate ventilator (with blender for adjustable oxygen delivery), thermoregulation control and infusion devices (syringe pumps).**~~

~~**cd. Fetal doppler/fetal heart rate monitoring device (if transporting High Risk Obstetrics – HROB). For long range transports, external cardiotocography monitoring device is required.**~~

**03.02.00** - Medical Direction: Same comment about EMS Board Certification

03.02.00 is about the responsibilities of the medical director and does not address specific board certification requirements.

**02.03.05 (2)** - would add clinical leadership to the make-up of the committee. Risk mitigation strategies and risk tolerance should include consideration of impact to the patient - the one party without a voice in the decisions. Without weighing clinical impact of decisions, the answer would always be to mitigate risk by not leaving base.

The committee agrees to make no changes. Some programs specifically do not include leadership in safety meeting to encourage more staff interaction and input.

**05.05.02 and 06.05.02** - change this to "Must have a policy for ..." rather than just a demonstrated practice. This would be consistent with the rest of the standards where we look for both written policy and demonstration of compliance rather than just demonstration of compliance.

The committee agrees and will change the wording in both the RW and FW sections to read:

05.05.02 and 06.05.02 Staffing – **Written operation policy addresses** a single mechanic on duty or on call 24 hours a day must be relieved from duty for a period of at least 24 hours during any seven consecutive days, or the equivalent thereof, within any one calendar month. In addition:

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As of September 1, 2024 with additional comments, as noted, from the Nov. 2024 Aviation Advisory Committee.

Any new submissions received after this date are continued on a new log.

*67 comments/suggestions received from 32 people*





## Submitted comments for Standards Changes from the 12<sup>th</sup> Edition to the 13<sup>th</sup> Edition Standards

### Comments for the SECOND Draft

#### Comments # 33 - # 65

September 1, 2024 - November 20, 2024

**Committee responses are in red.**

**Comments in Blue are notes/questions/suggestions**

Date 09/02/2024 # 33

Standard # - Suggested Change and Rationale for Change

**07.01.10, Page 7.2** Suggest change to "A ground service that does not accept or advertise requests for ground transport but is strictly available to transport flight crews and patients in connection to fixed wing transport or when the aircraft is out of service, unable to fly due to weather or when they patient cannot be transported safely in an air ambulance (weight, equipment concerns), is not considered a dedicated ground service and is not required to be included in the accreditation application. However, the following must be present to ensure a safe and appropriate ground transport, flight line and air to ground transfer.

The committee agrees with the changes and will reword the standard as:

A ground service that does not accept or advertise requests for ground transport but is strictly available to transport flight crews **and patients in connection to fixed wing transport or** when the aircraft is out of service, **unable to fly due to weather or when the patient cannot be transported safely in an air ambulance (weight, equipment concerns)**, is not considered a dedicated ground service and is not required to be included in the accreditation application. However, the following must be present to ensure a safe and appropriate ground transport, flight line and air to ground transfer:

**07.01.10** add to 1-7 (unsure of placement within the list) 8. Softpacs and clinical equipment must be secured by an appropriate clamp, strap or other mechanism in the vehicle to prevent movement during a crash or abrupt stop. 9. The program tracks frequency of occasional use of ground ambulance transport as back up when unable to respond or transport with a rotor wing and monitors the safety and utilization of ground services.

The committee agrees to the additions. The new list, following the paragraph above will be reworded as:

1. There is a checklist to verify on board equipment is in working order and oxygen is sufficient for the length of the transport.
2. Stretcher can be secured in a locked position to prevent movement during transport
3. **Supply bags and clinical equipment must be secured by an appropriate clamp, strap, bracket, or other mechanism to prevent movement during a crash or abrupt stop.**
4. Operator uses lights and sirens only when requested by the clinical crew.
5. Operator uses a hands-free communication system. Texting is prohibited while the ambulance is in motion.

6. Ground ambulance EMS license by State or AHJ is provided.
7. EVOC or equivalent training is required initially and at least every two years for vehicle operators.
8. **The program tracks frequency of occasional use of ground ambulance transport as back up when unable to respond or transport with a rotorwing, and monitors the safety and utilization of ground services.**

**07.01.10** Consider moving this section to RW and FW sections - mirrored version in each - and remove from Surface section - not needed in this section for Surface providers. For fixed wing we could eliminate the monitoring frequency and utilization but keep safety there is always GR component to FW use.

We will eliminate 07.01.10 and move the following wording to the Preface of the 07.00 SURFACE STANDARD:

“A ground service that does not accept or advertise requests for ground transport but is strictly available to transport flight crews **and patients in connection to fixed wing transport** or when the aircraft is out of service, **unable to fly due to weather or when they patient cannot be transported safely in an air ambulance (weight, equipment concerns)**, is not considered a dedicated ground service and is not required to be included in the accreditation application.”

Then we will add the following wording as a new standard in the Safety section:

#### **02.03.08 Supporting Ground Ambulance**

**A program owned or contracted ground/surface vehicle that is not advertised or used to accept requests for ground transport, but is strictly available to transport flight crews and patients when the aircraft is out of service, unable to fly due to weather, or when they patient cannot be transported safely in an air ambulance (weight, equipment concerns, or to or from the aircraft), is not considered a dedicated ground service and is not required to be included in the accreditation application. *(We use this wording in the Surface Preface as well.)* However, the following must be present to ensure a safe and appropriate ground transport, flight line, and air to ground transfer.**

1. There is a checklist to verify on board equipment is in working order and oxygen is sufficient for the length of the transport.
2. Stretcher can be secured in a locked position to prevent movement during transport
3. Supply bags and clinical equipment must be secured by an appropriate clamp, strap, bracket, or other mechanism to prevent movement during a crash or abrupt stop.
4. Operator uses lights and sirens only when requested by the clinical crew.
5. Operator uses a hands-free communication system. Texting is prohibited while the ambulance is in motion.
6. Ground ambulance EMS license by State or AHJ is provided.
7. EVOC or equivalent training is required initially and at least every two years for vehicle operators.
8. **The program tracks all ground ambulance transports and the reason for using the ground vehicle. The safety and utilization of ground ambulance is monitored as part of the program’s quality management system.**

Date 09/03/2024 # 34

Standard # - Suggested Change and Rationale for Change

**04.017.00 page 4.5** Request to make the meeting minutes requirement verbiage the same for 01.09.01 and 04.017.00. or to indicate in 04.017.00 to refer to 01.09.01. We had a Customer Communications Center that was "docked" because they did not include the title or role of the meeting attendees which is listed in 01.09.01, but they were only given section 4 to go through and comply with for their Program. Section 04.017.00 referring to meetings is very vague in section 4 and does not address the title or role of the attendee being required.

#### 04.07.00 FORMAL MEETINGS

Formal periodic meetings (separately held or part of the program's staff meetings) are strongly encouraged, for which minutes are kept on file. Minutes will include who is presiding, discussion, and who was present. There are defined methods, such as a communications book or electronic mechanisms, for disseminating minutes and information between meetings

whereas, 04.017.00 does address this:

01.09.00 Meetings and Records

01.09.01 Meetings

1. There are formal, periodic staff meeting for which minutes are kept on file and accessible for reference.
2. All meeting minutes (Staff, Safety, QM, etc.) include the following:
  - a. Date and time of the meeting
  - b. Base identification (if multiple bases)
  - c. Meeting type (Staff, Safety, QM, etc.)
  - d. List of those in attendance by both name and title or function (i.e., Director, RN, EMT P, RRT)
  - e. Name of the person presiding
  - f. Discussions (versus agenda/topic headings)
  - g. Assignments and responsibilities for open issues
  - h. Progress reports on open issues
  - i. Clear identification that an issue has been resolved (loop closure)
3. There are defined methods, such as a staff notebook or electric mechanism, for disseminating information to all staff members between meetings.
4. All meeting minutes (Staff, Safety, QM meetings, etc.) are kept on file and maintained for a minimum of three years.

Examples of evidence to meet compliance: Meeting minutes indicate attendance and representation by all disciplines. Action items, timelines, and areas of responsibility are well documented and demonstrate a flow of information that indicates tracking, trending, and loop closure.

If a Communications Center meeting minutes is required to have the same content as section 01, it should be referenced in section 4 or contain the same verbiage. Thank you for your consideration.

The committee agrees with the suggestions and will change the wording to:

#### 04.07.00 FORMAL MEETINGS

Formal periodic meetings (separately held or part of the program's staff meetings) are strongly encouraged for which minutes are kept on file. ~~Minutes will include who is presiding, discussion and who was present. Meeting minutes shall follow the standards as outlined in 01.09.01 There are defined methods, such as a communications book or electronic mechanisms, for disseminating minutes and information between meetings.~~

We will also add "Communication Center" in 01.09.01 2., 2.c, and 4. (Staff, Safety, QM, **Communication Center**, etc.)

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Date 09/12/2024 # 35

Standard # - Suggested Change and Rationale for Change

**Standard 01.08.01, Page 1.12** The current standards (as shown in the 12th Edition) are little changed from previous editions of the Standards. Wellness programs have been shown to be important for employee wellbeing and retention, as well as decreasing employee healthcare utilization. However, despite the importance of these programs, the current standards have very little detail and do not provide program managers, site surveyors, or the Board with concrete examples of what constitutes a good plan. Below are the current standards and a suggestion for strengthening those standards.

**Current standards: 01.08.00 PHYSICAL AND PSYCHOLOGICAL/EMOTIONAL WELL-BEING 01.08.01**

Physical and psychological/emotional well-being is promoted through:

1. Wellness programs that promote healthy lifestyles (e.g. balanced diet, weight control, no smoking).
2. Resources to promote psychological and emotional well-being such as suicide prevention training, trained peer support team, and employee assistance programs (strongly encouraged).
3. Evidence of an injury prevention program and ergonomic strategies to reduce employee injuries.

*Examples of evidence to meet compliance: Personnel are observed following the program's dress codes and are knowledgeable about policies regarding physical well-being. Pregnancy policies are consistent with current national laws and may address notification to employer requirement, written documentation requirements to continue on duty, and possible alternative duty assignments if team member is restricted from transport duty.*

**Suggested Standards: 01.08.00 PHYSICAL AND PSYCHOLOGICAL/EMOTIONAL WELL-BEING**

01.08.01 Physical and psychological/emotional well-being is promoted through:

1. Wellness programs that promote healthy lifestyles. These programs should include incentives, education, and infrastructure to promote exercise and healthy eating, as well as discouraging tobacco and vaping use.
2. Health and wellness education as part of continuing education programs.
3. Resources to promote psychological and emotional well-being such as suicide prevention training, trained peer support team, and employee assistance programs (strongly encouraged).
4. Evidence of an injury prevention program and ergonomic strategies to reduce employee injuries. Should include regular education and practice.

5. Evidence of a financial commitment to these programs (e.g.: dedicated wellness budget and / or dedicated staff).
6. Evidence of a wellness advisory council

*Examples of evidence to meet compliance:*

*Incentives*

- *Gym membership subsidy*
- *Nutrition counseling coverage*
- *Support for fitness evaluation*
- *Subsidy to join exercise clubs (e.g.: running, cycling)*
- *Subsidy to join yoga studios, climbing gyms, etc.*
- *Subsidy to purchase lift tickets*
- *Subsidy to purchase workout clothing and shoes*
- *Insurance discount for being tobacco / nicotine free Education*
- *Stress management*
- *Healthy eating*
- *Men's Health*
- *Women's Health*
- *Dental Health*
- *Heart disease risks*
- *Managing Blood Pressure*
- *Managing cholesterol*
- *Proper lifting techniques*
- *Managing heat stress*
- *Suicide risk recognition and prevention Infrastructure*
- *Providing workout equipment at the base*
- *Providing a dedicated workout area at the base*
- *Providing height-variable workstations for communications specialists*
- *Providing lactation rooms*
- *Access to emotional support animals*
- *Employee assistance program*
- *Peer trainers (physical health)*
- *Peer support (emotional / psychological health) Employee knowledge and participation*
- *Employees are aware of available programs and knowledgeable on wellness topics*
- *Participation in wellness activities by >75% of employees*
- *Surveys of employee wellness needs*

The committee agrees with the concept and after lengthy discussion agreed to the following wording changes. "Psychological/emotional well-being" was moved to #1. and the numbering will be adjusted. Those items being struck are now listed as evidence of meeting or exceeding compliance and the suggested "evidence to meet" list has been consolidated and paired down in number.

01.08.01 Physical and psychological/emotional well-being is promoted through:

1. Resources to promote psychological and emotional well-being such as suicide prevention training, trained peer support team, and employee assistance programs (strongly encouraged). (was # 2)

2. Wellness programs that promote healthy lifestyles. ~~(e.g., balanced diet, weight control, no smoking).~~ (was # 1)
3. Evidence of an injury prevention program and ergonomic strategies to reduce employee injuries. **Should include regular education and practice.**
4. **Evidence of a multidisciplinary wellness advisory council is encouraged (new)**  
**The remaining standards are unchanged but will be renumbered:**
5. Protective clothing and....
6. Exposure control – dress codes ...
7. Written policies addressing: ...

*Examples of evidence to meet or exceed compliance:*

- *Programs that support physical activity (gym membership, yoga studios, workout facilities/equipment at bases, running area, etc.)*
- *Programs that support healthy life style (smoking cessation, nutritional counseling, stress management, health risk assessments, etc.)*
- *Staff support and comfort (ergonomic furniture and workstations, lactation room, emotional support animals, peer support, etc.)*
- *Staff education and awareness (availability of employee assistance programs, managing heart health, women's health, men's health, etc.)*
- *Personnel are observed following the program's dress codes and are knowledgeable about policies regarding physical well-being. Pregnancy policies are consistent with current national laws and may address notification to employer requirement, written documentation requirements to continue on duty, and possible alternative duty assignments if team member is restricted from transport duty.*

.....  
Date 09/18/2024 # 36

Standard # - Suggested Change and Rationale for Change

**01.04.02** The Board of Directors, administrative and management staff are ~~encouraged~~ required to complete an annual conflict-of-interest statement or form, disclosing any actual or potential conflicts. Please define "administrative" staff. This could include a wide array of staff including communication specialists, billing, etc.

The committee agrees additional clarification would be helpful. We will reword the standards as:

**01.04.02** The Board of Directors, administrative and management staff, **having financial decision making authority**, are required to complete an annual conflict-of-interest statement or form, disclosing any actual or potential conflicts.

**03.01.01.4.a.** "The medical director should be board-certified in emergency medicine,. Board certification in Emergency Medical Services is strongly encouraged. but if If he or she is not, it is strongly recommended that the medical director be board-certified in family medicine, internal medicine, surgery, or pediatrics with demonstrated EMS education (e.g., NAEMSP medical director course) or 5 years of experience in emergency medicine.

1) I think that may be a typo - is it required or encouraged?

2) Recommend Board certification be based on transport types, i.e. critical care certification is more relevant for many FW services than surgery or emergency medicine.

The committee agrees that has it has been reworked the wording has become more confusing. The new wording will be:

**03.01.01 (BLS) 4.a and 03.01.02 (ALS) 3. A**

The medical director should be board-certified in emergency or critical care medicine aligned with the mission and scope of the program. For those programs doing scene response, board certification in Emergency Medical Services is strongly encouraged. If not meeting this standard, it is strongly recommended that the medical director be board-certified in family medicine, internal medicine, surgery, or pediatrics with demonstrated EMS education (e.g., NAEMSP medical director course) or 5 years of experience in emergency medicine.

**03.02.13 Medical Control On-Line Medical Direction**

1. The medical director(s) is actively involved in orienting physicians providing on-line (in-transport) medical direction according to the policies, procedures and patient care protocols of the medical transport service. . Periodic updates will be provided whenever there are changes to the protocols or program policies that may impact patient care.

1.) Has CAMTS considered the increased roles mid-level providers (PA, NP) are taking in medical control? In rural areas especially, the phone may be handed over to a PA but this policy does not allow that.

The committee agrees that the person providing on-line medical direction may not always be a physician. We will change the wording to read:

**03.02.13 Medical Control On-Line Medical Direction**

1. The medical director(s) is actively involved in orienting physicians **or other advance clinical practice providers (PA, NP)** providing on-line (in-transport) medical direction. **Orientation should be** according to the policies, procedures, and patient care protocols of the medical transport service. **Periodic updates will be provided whenever there are changes to the protocols or program policies that may impact patient care.**

**03.05.01..3.g.** Current paramedic certifications (such as NRP) strongly encouraged for paramedics who have been employed for more than 2 years and are conducting ALS/BLS transports.

1) Shouldn't current paramedic certifications be required?

The committee agreed to make no changes.

**03.05.03.f.** FEMA or other Emergency Management classes are provided for scene and disaster response.

1) add "within the United States". These courses are not applicable for scene/disaster responses outside of this country.

The committee agreed to make no changes. While FEMA is within the United States, other Emergency Management classes would apply in Canada and other locations. As with all standards we look at the Authority Having Jurisdiction (AHJ).

**03.07.01.7.1.** Recommend adding the QuantiFERON-TB Gold test (QFT) as well.

The wording of this standard was changed in the posted first draft of the 13<sup>th</sup> edition. It appears as below. We will add the QFT as well.

~~• Provide annual tuberculosis testing (purified protein derivative) especially if conducting international transports and other testing, screenings and vaccinations as consistent with current national guidelines (such as the CDC, AHJ, or WHO). This includes medical personnel, pilots and mechanics. (The CDC or WHO may deem the localized region low risk and annual testing not necessary, but this applies only if the service does not operate or respond outside of the local region)~~

- Programs conducting international transports or operating in localized regions determined at high risk for tuberculosis, must provide annual tuberculosis testing (purified protein derivative or QuantiFERON-TB Gold test (QFT)), as consistent with current and other testing, screening, and vaccinations, and as consistent with current national guidelines (such as the WHO, CDC, AHJ). This includes medical personnel, pilots, and mechanics.

**03.03.01** If transport nurses are part of the medical team, they must report to a nurse or physician on clinical issues.

- 1) Recommend expanding this to include mid-level providers as well.

The committee agreed to make no changes. Reporting is often directed by state law (AHJ). PAs are required to report to a physician and nurse practitioners are nurses.

**03.03.06.16.** Safety and risk management training (strongly encouraged)

- 1) Make required, not encouraged

The committee agrees. We will delete “strongly encouraged” in standards 03.03.06 16. For Clinical Care Supervisor and 03.04.01 5. for Program Manager

**03.03.06 16.** Safety and risk management training ~~(strongly encouraged)~~

**03.04.01 5.** Safety and risk management training ~~(strongly encouraged)~~

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Date 09/18/2024 # 37

Standard # - Suggested Change and Rationale for Change

**03.05.01.1.c.** The transport program will provide a basic outline of initial education that is not limited to, but must include: ...

- 1) Add "if applicable". For instance, long-range and international programs do not utilize EMS Radio Communications or scene management/rescue/extrication.

**03.05.02.2.a** 1) Add "if applicable" for EMS radio communications.

The committee agreed changes to these standards are not needed. The opening statement for both 03.05.01 and 03.05.02 include the wording “These must be specific and appropriate for the mission statement and scope of care of the medical transport service.” For example, if scene response is not included in the scope of care of the service, utilization of EMS radio, training in scene management and extrication, etc. would not apply.

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Date 09/18/2024 # 38

Standard # - Suggested Change and Rationale for Change

I have a few suggestions:

1. We need to specify certain limitations to transferring twins that are based on manufacture specs of the transport incubator. Example: International Biomedical who supports 95% of the transport incubator market has a weight limit of 11 pounds total for it’s voyager transport incubator, and 16 pounds for the NxtGen transport incubator released in the last year. Obviously this has to be taken into consideration.



2. I would advocate that the preference is not to use a single incubator for twins rather each have their own.

3. The terminology used is transport incubator, not isolette.

The committee believes the standards already address the transport of a single patient (unless conjoined twins) in an isolette in AS: 03.06.01 4. e. **The committee agrees to change the term “isolette” to “transport incubator”.** There are 11 places in the Standards where this will be updated. The committee also agrees to add to Standard 03.06.01 19. e:

e. Securing Equipment

- **Isolette Transport incubator:**

- There must be some type of restraining device within the **isolette transport incubator** to protect the infant (under 10 pounds or 4.5 kg) in the event of air turbulence or poor road conditions.
- **Isolette Transport incubator** must be capable of being opened from its secured position in order to provide full access to the infant in the event of complicated airway problems or extrication from the **isolette transport incubator** becomes necessary.
- **The weight of the patient and equipment must not exceed the manufacturer’s specifications.**

**Suggestion: 03.06.01 4. e.** Strong preference is to have a policy that prohibits dual patient transport inside the same incubator. Exceptions addressed in the policy would be for conjoined twins. If non-conjoined twins must be transported in the same incubator, they must each have a full complement of equipment (to include but not limited to cardio-respiratory monitors, ventilators, IV Pumps) and show no evidence of infection in one or different infections in both. In the event that one twin arrests, there must be mitigation, i.e., additional warming method that can be applied to the non-arresting twin. Use of the single transport incubator for twins must comply with manufacture specs, i.e weight limit not to be exceeded. (RW/FW/S)

The committee agrees with the following changes”

03.06.01 4.e

A policy that prohibits dual patient transport inside the same incubator ~~unless the situation is conjoined twins or twins are transported with full complements of equipment for each and show no evidence of infection in one or different infections in both.~~ Exceptions addressed in the policy would be for conjoined twins. If non-conjoined twins must be transported in the same incubator, they must each have a full complement of equipment (to include but not limited to cardio-respiratory monitors, ventilators, IV Pumps) and show no evidence of infection in one or different infections in both. In the event that one twin arrests, there must be mitigation, i.e., additional warming method that can be applied to the non-arresting twin. **Use of the single transport incubator for twins must comply with manufacture specs, i.e weight limit not to be exceeded. (RW/FW/S)**

Date 09/19/2024 # 39

Standard # - Suggested Change and Rationale for Change

Addition of stress management and health and wellness training for communicators. NENA is recommending 8 hours annually for 911 professionals. I'm not sure our industry has the capacity to add this directly, but I suspect this is something that the professional communicators in this industry should be trained on. I would recommend additionally adding the standard as a recommendation to follow. NENA-STA-002.2-2022, NENA Standard to Protect the Wellbeing of 9-1-1 Professionals

<https://www.nena.org/general/custom.asp?page=standards#Wellness>

The committee agrees we will add the following as "Examples of evidence to meet compliance;" following 04.03.00 for Communication Specialist initial and annual training:

**The National Emergency Number Association (NENA) training NENA-STA-002.2-2022, NENA Standard to Protect the Wellbeing of 9-1-1 Professionals**  
<https://www.nena.org/general/custom.asp?page=standards#Wellness>

.....

Date 09/20/2024 # 40

Standard # - Suggested Change and Rationale for Change

**03.01.03.** The wording here on primary care provider still makes it seem like only an RN (or MD/PA/APRN) can fill this role. So this sets up scenarios where a medic can never do this unless they have the 3 years of time in an ER or ICU as the standards define critical care in only those ways. This is a slap in the face to medics. CAMTS has continued to use language to setup scenarios where a medic with 20+ years of flight experience cannot be the primary care provider when flying with a new flight nurse. If this is not your intent, you need to amend the definition of critical care to include critical care transport time at the very least. Otherwise, this is an insult to the paramedic profession.

The committee agrees that it was never the intent to exclude a paramedic from taking the primary role. In fact, some states specifically require the lead be a paramedic for scene responses. We will eliminate the word "primary". The committee agrees with the following wording change (in addition to those already purposed in the posted draft):

03.01.03.

2. Clinical Crew

a. A minimum of two medical personnel (who are licensed according to state and/or national requirements) who provide direct patient care plus a vehicle operator

- The ~~primary~~ care provider of the clinical crew may be a resident or staff physician, advanced practice nurse, registered nurse, physician assistant or a paramedic. ~~The primary~~ At least one care provider must have **three (3) full time equivalent** years of critical care experience. (Critical care experience is defined as ~~no less than 4000 hours~~ experience in an ICU or an emergency department.) In addition, clinicians ~~in the primary care provider role~~ must have pre-hire experience and/or education in the medications and interventions as defined in the program's scope of care and services.
- .....

Date 09/23/2024 # 41

Standard # - Suggested Change and Rationale for Change

Email to Jan from ARC: Thank you again for the clarifications a few weeks ago about how the Red Cross is referenced and accepted for ACLS (Red Cross ALS) and PALS. When I reached out I stated we were getting ready to release our NALS program (an equivalent to NRP). In the next few weeks I will have a complete Participant's Manual and Instructor's Manual ready for your review.

However, I see that your standards are in the process of being updated for 2025. How can the Red Cross programs (BLS; ALS; PALS; and NALS) be added to the definitions and requirements sections for training formally? Our programs are scientifically equivalent to all of the AHA based programs (all are derived from the ILCOR Consensus on Science with Treatment Recommendations (CoStar)) and should be considered in the same manner as AHA.

The committee has referred this to the Education Committee to be included in the Education and Certification matrix which is posted on the CAMTS website with the other equivalent courses.

.....

Date 09/24/2024 # 42

Standard # - Suggested Change and Rationale for Change

**03.01.03** in the proposed 13th Edition addressing the role of "primary care provider" indicates "The primary care provider must have three (3) full-time equivalent than 4000 hours' experience in an ICU or an emergency department.)" This is discriminatory to the paramedic role and could have a significant negative impact on the ability of an experienced paramedic to be considered as a preceptor to a new orienting nurse. While I see the need for standards to prevent a green on-green situation, consideration needs to be given to the role of the paramedic and include critical care flight experience and not limit it specifically to ER or ICU experience.

Please see the response to submission #40 above.

.....

Date 09/25/2024 # 43

Standard # - Suggested Change and Rationale for Change

**New Standard(s).**

There are clear training/education standards for the Medical Director, Program Manager, and Clinical Care Supervisor (see, e.g., 03.03.00, 03.04.00, and 03.02.02).

There are no similar guidelines for other supervisors, Directors, or managers. I suggest that for the supervisors/managers in Communications, Ground Operations, Base Managers, Vehicle Maintenance Supervisor, and Chief Pilot/Aviation Site Manager should have parallel training/education requirements as the Medical Director, Program Manager, and Clinical Care Supervisor, including: involvement in Quality and Administrative Processes, Crew Resource Management (AMRM), "Just Culture" education, and additional annual training including stress recognition and management safety and risk management, Incident Command, and fatigue recognition and management. Would make CMTE an "example of exceeding the standard" for each job role.

The committee agrees that the wording should include the same leadership training for all those "holding operational or supervisory" positions. Over the years titles and functions have changes, combined, and even been separated and expanded. The suggestion is to change 03.04.00 PROGRAM MANAGER to PROGRAM MANAGEMENT and list the training required and common for all positions having operational or supervisory responsibilities. Those items under the Medical Director (03.02.00) and Clinical Supervisor (03.03.00) can then be eliminated in those sections, leaving just those items

specific to the Medical Director and Clinical Supervisor. The committee will work to reorganize this section of the Standards and develop a chart outlining the management training.

**04.06.00 Post-Transport Debrief** The policy requires a debriefing be conducted and that it include Communications. Recommend clarifying that all Operations personnel involved in the transport (vehicle operators, Comms, and clinical staff) participate in the debriefing and that it be memorialized in a paper or electronic record, ideally linked with the program's quality reporting system.

We will take the 04.05.00 Shift Briefings and 04.06.00 Post Transport Briefing out of the Communication Section and move them to standards under 02.03.00 SAFETY MANAGEMENT, since they apply to all disciplines. This will renumber some of the standards. The suggested wording would be:

**~~04.05.00~~ 02.03.07 SHIFT BRIEFINGS**

**Program policy outlines** ~~There are shift briefings conducted at the beginning of each shift to assure continuity between shifts. that include communication personnel.~~ **The policy should outline the time of the briefings and include all disciplines paramount to the safety of the patient, crew, and/or vehicle (clinical staff, pilot/driver, communications, maintenance, etc.).**

**~~04.06.00~~ 02.03.08 POST TRANSPORT DEBRIEF**

**Program policy outlines** ~~A post transport debrief is conducted after each transport. The debrief that includes the communication specialist when communication issues are involved, maintenance when vehicle issues are involved and others as needed. The debriefs are memorialized in a paper or electronic record and linked with the program's quality reporting system~~

.....  
Date 09/27/2024 # 44

Standard # - Suggested Change and Rationale for Change

**03.01.02 - 3. and 03.01.03 - 3 - Medical Director:** The committee agrees and the wording will be changed to: 03.01.02 3. The medical director should be board-certified in emergency medicine. Board certification in Emergency Medical Services is strongly encouraged. If he or she is not, it is strongly recommended that the medical director be board-certified in critical care (pulmonary/critical care or pediatric critical care medicine), internal medicine, surgery, or general pediatrics with demonstrated EMS competency or 5 years of experience in EMS and/or interfacility care.

This is addressed in submission # 35 above.

.....  
Date 10/01/2024 # 45

Standard # - Suggested Change and Rationale for Change

**New Standard** There should be consistent minimum leadership/managerial training standards for all supervisors, not just the Clinical Supervisor, Medical Director, and Program Manager. Recommend that Operational roles accountable for leading a service line, such as Communications Manager, Ground Operations Manager, Base Manager, and Chief Pilot, and other similar leadership roles defined by role and not necessarily by title, have parallel initial and recurrent education requirements including performance improvement, Human Factors and Crew Resource Management (AMRM), "Just Culture" education, stress recognition and management, exposure control, altitude physiology, and safety and risk management. For all these roles, current certification as a CMTE can be evidence of exceeding the Standard.

This is addressed in the response to submission # 43 above.

**New Standard** Medical transport is a specialty and leadership staff often rise through the program without significant formal leadership training. At least one member of the program leadership team, defined as the group from the Program Manager through the service line leaders for clinical care, communications, aviation/chief pilot, and ground operations/lead EMT should be currently certified as a CMTE, reflecting current education in the intersection of leadership and the medical transport industry.

As we restructure the management training as listed above we will include: **“At least one person holding an operational and/or supervisory position is a Certified Medical Transport Executive (CMTE). CMTE is encouraged for all management staff”.**

**02.03.01** This standard requires “formal safety training” for the Safety Officer. Recommend that current certification as an MTSP-C or CSP, reflecting achieving a standard of specialty training in safety be required of the program safety officer within three years of assuming the role.

The committee agrees we will add the following wording:

**02.03.01** Safety Management System (SMS) – Management is responsible for development of an effective SMS and training all staff. Both management and staff are responsible for making operations safer.

- 1.** The designated safety director(s)/officer(s) receives formal **medical transport specific** safety related training pertinent to the program’s scope of services. **Certification as a Medical Transport Safety Professional (MTSP-C) is strongly encouraged.**

**02.03.08** This standard describes the post-incident accident plan. Recommend that having a program leader who has completed the LIFT program be evidence of exceeding the Standard.

The Committee agrees and will add as “evidence of exceeding the Standard”.

.....

Date 10/08/2024 # 46

Standard # - Suggested Change and Rationale for Change

**03.06.01 8.a.** "The transport service has a method of assuring that all medications and intravenous fluids are appropriately calculated. Examples of effective methods include the use of drug calculation lists, internet-based programs, and pre-programmed drug delivery systems such as those found in medication pumps..."-Not a vehicle standard, is a clinical standard 9 - same comment

**03.06.01 8.a.** "...A customizable medication formulary within the IV pump is encouraged." This should move from encouraged to required. It is standard of care in hospitals and greatly decreases rates of medication infusion errors

**8. Medications consistent with the service’s scope of care are accessible.**

**a. The transport service has a method of assuring that all medications and intravenous fluids are appropriately calculated. Examples of effective methods include the use of drug calculation lists, internet-based programs and pre-programmed drug delivery systems such as those found in medication pumps. A customizable medication formulary within the IV pump is required for critical care and specialty care and strongly encouraged for ALS.**

.....

Date 10/10/2024 # 47

Standard # - Suggested Change and Rationale for Change

Since a trauma course is required for pediatric specialty teams, I suggest the following change. c. Advanced Trauma Life Support (ATLS) according to the American College of Surgeons, ATLS audit, ATCN for Nurses, Transport Nurse Advanced Trauma Course (TNATC) or Transport Professional Advanced Trauma Course (TPATC) or equivalent (not required for neonatal teams who do not provide **pediatric or adult care**) (See Education Matrix for equivalent criteria)

**The committee agrees with the above change.**

My thought on this change is that we want the clinical experience to be more than labor and delivery, especially when using HPS for clinical time. Normal labor and delivery is at the ALS level, not Crit Care, and the objectives should reflect this.

2b. Clinical and laboratory continuing education must be developed and documented on an annual basis as pertinent to scope of care to follow. If simulation teaching/learning modalities are used as an adjunct to or substitution for clinical experiences, there must be documentation that the scenarios and objectives are reviewed annually, references are current, and the learning objectives were met. Simulation may include the use of dynamic human patient simulators, standardized patients (trained medical actors), computerized interactive devices, virtual reality, and serious gaming. Examples can be found in references.

- Critical care (adult, pediatric, neonatal)
- Emergency/trauma care
- Invasive procedure labs
- Labor and delivery change **to High Risk OB**

**The committee agrees with the above change.**

.....  
Date 10/14/2024 # 48

Standard # - Suggested Change and Rationale for Change

I am a flight RN. I am reaching out to clarify how CAMTS interprets prior military service at the ALS and Critical Care level. I have a friend who will be separating from the Airforce next July and is trying to find a job as a critical care paramedic. His applications to Air medical programs are being rejected because he lacks 3 years of "civilian 911" ALS service. However, he has been a National Registry Paramedic since 2019 and has been operating as such with a Special Operations unit as a medical operations manager. He has extensive ALS and Critical Care patient transport experience. When he asks why his military paramedic experience does not meet requirements, he is told it is due to "... CAMTS accreditation requirements...". My program managers share the same explanation. The CAMTS guidelines 03.01.03 Critical Care, Section 2, subsection C specify "If a crewmember is a paramedic, 3 years (minimum of 4000 hours) of ALS experience is required." I cannot find anything that specifically requires "civilian 911" experience. This individual has all of his training records and a detailed record of his direct patient care contact hours. I realize CAMTS provides guidelines with requirements, recommendations, and advisements for programs to achieve accreditation. I feel like misinterpretations of these guidelines might be hindering very knowledgeable and experienced service members from being hired by civilian programs. I would be great if CAMTS was able to help programs develop a pathway for military service members with equivalent experience, education, and certifications to be able to transition more smoothly. I realize this would take time and resources , but for now any insight or advice you can provide is greatly appreciated. Also, I would be very willing to reach out to anyone you can recommend that could provide direction

**CAMTS does not specify "civilian 911" ALS service. It is up to the program to define the clinical competency of a potential provider and to fill in the gaps between what is required to meet the program's mission, scope of services and scope of practice. While in the past, military medical training**

was believed to be primarily focused on combat related injuries, that is not necessarily the case. Training and experience likely include most patient types and ages. This is being referred to the CAMTS Education Committee for further direction and for comments from several of our Board members currently in the medical branch of the military. Another opportunity to balance the training in the eyes of potential employers is to become either PF-C or CCP-C.

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Date 10/24/2024 # 49

Standard # - Suggested Change and Rationale for Change

Dear CAMTS Standards Committee, I hope this letter finds you well. As the Chair of the Safety Management Training Academy (SMTA), I am writing to express our strong support for the inclusion of the SMTA and the Medical Transport Safety Professional Certification (MTSP-C) in the accreditation standards of the Commission for Accreditation of Medical Transport Services (CAMTS). The safety of patients and medical transport personnel is paramount in our field. The SMTA has dedicated itself to advancing safety management principles specifically tailored for the medical transport industry. Our training programs emphasize risk assessment, hazard identification, and the development of effective safety protocols. By integrating the SMTA and MTSP-C into CAMTS standards, we can collectively elevate the quality and safety of medical transport services. Research shows that organizations with robust safety management training experience significantly lower incident rates and improved patient outcomes. The MTSP-C credential, awarded to professionals who demonstrate comprehensive knowledge of safety management, is designed to foster a culture of safety within transport services. Including this certification as part of CAMTS accreditation would ensure that personnel are not only trained in technical skills but also equipped with essential safety management competencies. Furthermore, aligning CAMTS standards with the SMTA and MTSP-C would provide a unified framework for safety practices across the industry. This initiative would not only enhance accreditation credibility but also instill confidence in patients, families, and stakeholders regarding the safety of medical transport services. We would welcome the opportunity to discuss this proposal further and explore how we can work together to enhance safety standards in our industry. Thank you for considering this

Please see the responses in submission # 45 above.

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Date 10/17/2024 # 50

Standard # - Suggested Change and Rationale for Change

#### **Addendum A – Education and Certification Matrix**

##### **Certifications**

A certification must come from a recognized **and accredited** professional **credentialing** body, for example, the Board of Certification ~~of the for~~ Emergency Nurses Nursing Association (BCEN) and **is be** supported **or recommended** by an association who is a member of the CAMTS Board. This assures that the exam has been developed from a focused body of knowledge, has validity and reliability, and is administered in a secure environment. (see page 8 for recommended certification exams).

##### **Additional notes:**

- The **Board of Certification for Emergency Nursing** (BCEN) is an independent, nonprofit certification board and is not a part of ENA.



- **AMTS Board member association**, should CAMTS wish to incorporate a reference to ASTNA's position statement(s) re: the CFRN & CTRN, the primary one is here:
  - [Transport Nurse Certification-Updated 2019](#)
  - These other two also speak to certification:
    - \*[Critical Care Transport Nurse Safety in the Transport Environment-Updated 2018](#)
    - \*[Role of the Registered Nurse in the Out-of-Hospital Environment-Updated 2018](#)
- \*Certifying bodies are responsible to ensure their exams are based on a specific/focused body of knowledge and ensure the validity, reliability, security, etc., of their exams.
- \*In BCEN's case, for example, the fact that the CFRN, CTRN and CPEN certification programs meet or exceed industry standards for basis in a defined and focused scope of knowledge, and are valid, reliable, secure, etc., is both a function of BCEN's internal standards and processes, and also because each of these certification programs are also **independently accredited** by the Accreditation Board for Specialty Nursing Certification (ABSNC). (To be clear it's each certification program and not the certifying body, that earns accreditation ... aka, the CFRN and CTRN and CPEN certifications are accredited by the ABSNC.)
- \*ABSNC accreditation of a certification program is contingent on 18 standards being met

[https://absnc.org/sites/absnc/files/docs/2019/overview\\_of\\_accreditation\\_standards\\_for\\_examination\\_based\\_certification\\_programs\\_0.pdf](https://absnc.org/sites/absnc/files/docs/2019/overview_of_accreditation_standards_for_examination_based_certification_programs_0.pdf)

**Also:**

#### **Certifications – Examples of Certification Exams and Resources:**

All of the listed resources have websites where additional information about the specific examinations, requirements to take the exams, and where the exams are administered.

- **Board of Certification for Emergency Nursing (BCEN)**
  - o **CFRN: Certified Flight Registered Nurse**
  - o **CTRN: Certified Transport Registered Nurse**
  - o CPEN: Certified Pediatric Emergency Nurse
- ~~In conjunction with the Air and Surface Transport Nurses Association~~
  - o ~~CFRN: Certified Flight Registered Nurse~~
  - o ~~CTRN: Certified Transport Registered Nurse~~
- **International Board of Specialty Certification (ISBC)**
  - o FP-C: Certified Flight Paramedic
  - o CCP-C: Certified Critical Care Paramedic
- **National Certification Corporation**
  - o C-NPT: Certified Neonatal Pediatric Transport

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Date 10/29/2024 # 51

Standard # - Suggested Change and Rationale for Change

**Section 03.01.03** under critical care, 2.a.i. in regards to the primary care provider. "Critical care experience is defined as experience in an ICU, emergency department, critical care ground, or critical



care air medical service. With most medics coming from pre-hospital it would fit this section better to write in where there background comes from. Especially since paramedics can be considered a primary care provider per CAMTS.

See the committee response to submission # 40.

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Date 10/30/2024 # 52

Standard # - Suggested Change and Rationale for Change

I believe dispatching has lost its professionalism. Years ago, dispatchers were required to have an EMT certification and that is no longer. While I know it would be a costly change for some, I believe it would be in the best interest to bring that requirement back or something with similar training.

It's a general practice to not question a dispatcher, however, when they are the least trained or have no EMS training at all, bad decisions are made and the people who are educated are not allowed to ask a valid question. With this lack of requirement, dispatchers are uneducated as to what a crew's scope of practice is and dispatch inappropriately.

CAMTS has never had a standard that requires EMTs, they have been encouraged or strongly encouraged for at least ten years. While an EMT does make sense for some programs, for many that are doing scheduled, specialty, and/or interfacility transports, it may not. This is up to the program to determine the staffing based on their mission and scope of services and to assure the communication staff is appropriately trained. The committee agrees to make no change to the standard.

There should be more definitions regarding crew rest. Most agencies agree that it is necessary, but hate anytime it's in acted. Comparing the amount of times different bases in a system call for crew rest, just pits crews against each other. Crew rest needs to be something a crew should be able to ask for without any repercussions. Especially from uneducated dispatchers.

Reach out for type of definitions. What else would you suggest? (Make name and contact information required). Program issues. No change to the standard?

An email was sent to the person submitting this suggestion but with no response.

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Date 11/08/2024 # 53

Standard # - Suggested Change and Rationale for Change

Comment on proposed change to section **03.01.03**. While I agree in principle with the idea of creating a standard that would set who could be a "primary" provider, the current proposed verbage seems to alienate the paramedic population. Not all paramedics have ICU or ED work time. Paramedics are hired for their time in busy EMS or 911 systems. There are many skilled flight paramedics who have never worked in an ICU in a hospital, and thus would not qualify per the new wording as a "primary provider" even if they had many more years flying than the RN they were with. It seems a better way to say that would be to add something with "equivalent critical care transport experience" so as to recognize that many of the medics in critical care air transport come up through a different route than the hospital setting.

See the committee response to submission # 40.

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Date 11/09/2024 # 54

Standard # - Suggested Change and Rationale for Change

Standard #: **03.01.03** Suggestion for Change: In the proposed definition of "primary care provider," I recommend modifying the experience requirement to include critical care transport experience as equivalent to ICU or emergency department experience.

Suggested language: "The primary care provider must have three (3) full-time equivalent years of critical care experience, defined as at least 4,000 hours in an ICU, emergency department, or equivalent critical care transport experience."

Rationale for Change: This change would recognize the expertise of experienced paramedics who develop critical care skills in the transport setting. The current language risks excluding skilled paramedics and could lead to newly trained nurses being placed in primary provider roles prematurely, potentially impacting team dynamics and patient safety. This addition better aligns with the team-based approach in critical care transport, ensuring that every crew has a seasoned provider to lead decision-making effectively.

See the committee response to submission # 40.

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Date 11/09/2024 # 55

Standard # - Suggested Change and Rationale for Change

**Exactly the same wording as Item # 54**

See the committee response to submission # 40.

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Date 11/09/2024 # 56

Standard # - Suggested Change and Rationale for Change

Proposed changed to Section **03.01.03** under critical care definition of "primary provider." I believe it's excellent to attempt to avoid new aka "green" crew members of all clinical backgrounds flying together, especially in these times of such a new and "green" overall base in the healthcare field. That being said I have concerns that programs, especially in rural areas and non hospital based programs, who fly with RN and Paramedic teams will loose out on the ability of new RN's to be supported by seasoned and experienced critical care Paramedics. The change in wording would exclude Paramedics with 3 full time equivalent years of experience in a transport environment from being eligible as a primary care provider and mentor/preceptor for new RN's simply because they work prehospitally. Please consider adding to the primary care provider definition or eligibility "experience in an ICU, ED or equivalent critical care transport experience." This will marry the spirit of the rule with the actual experience requirements to manage as a primary provider when rapidly evolving decisions and clinical experience are necessary, and afford us a path forward as we rebuild the experience levels in our field. Thank you!

See the committee response to submission # 40.

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Date 11/10/2024 # 57

Standard # - Suggested Change and Rationale for Change

**Exactly the same wording as Item # 54**

See the committee response to submission # 40.

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Date 11/10/2024 # 58

Standard # - Suggested Change and Rationale for Change

**Exactly the same wording as Item # 54**

See the committee response to submission # 40.

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Date 11/10/2024 # 59

Standard # - Suggested Change and Rationale for Change

**Exactly the same wording as Item # 54**

See the committee response to submission # 40.

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Date 11/10/2024 # 60

Standard # - Suggested Change and Rationale for Change

**Exactly the same wording as Item # 54**

See the committee response to submission # 40.

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Date 11/10/2024 # 61

Standard # - Suggested Change and Rationale for Change

**Exactly the same wording as Item # 54**

See the committee response to submission # 40.

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Date 11/10/2024 # 62

Standard # - Suggested Change and Rationale for Change

**Exactly the same wording as Item # 54**

See the committee response to submission # 40.

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Date 11/10/2024 # 63

Standard # - Suggested Change and Rationale for Change

**Exactly the same wording as Item # 54**

See the committee response to submission # 40.

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Date 11/19/2024 # 64

Standard # - Suggested Change and Rationale for Change

Proposed change **03.01.03** Requiring a paramedic to have ED or ICU experience is ridiculous! You're going to end up with brand new flight nurses over ruling experienced paramedics. Make it make sense!

See the committee response to submission # 40.

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Date 11/20/2024 # 65

Standard # - Suggested Change and Rationale for Change

The primary care issue. Denominating nurses as the only option as the primary care provider shows a fundamental lack of understanding how HEMS actually works. If your goal was to infuriate half of your constituents, congratulations. You have outdone yourself.

See the committee response to submission # 40.

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**As of December 20, 2024**

**Any new submissions received after this date will be continued on a new log.**

*50 comments/suggestions received from 33 people*