

*Mary Ann Ferrara, President*

*Please Reply To:  
1027 Hoyt Ave., #8  
Ridgefield, NJ 07657-1517*

July 2, 1999

Mr. Gerard C. Muench  
Director, Emergency Medical Services  
State of New Jersey  
Department of Health and Senior Services  
PO Box 360  
Trenton, NJ 08625-0360

Dear Mr. Muench:

I am writing you on behalf of the New Jersey State First Aid Council, Inc. ("NJSFAC"), regarding your Department's recent proposal on EMT-Basic/Defibrillation (copy attached). The NJSFAC strongly opposes this proposal. Our reasons are as follows:

First, the NJSFAC took the initiative and submitted a plan for SAED certification of EMT-Bs, over one year ago. That plan advocated the use of currently existing professional rescuer training and certification programs offered by the American Heart Association and the American Red Cross. Your own department validated this proposal by surveying other states. It turns out that a majority of the states (29), that replied to the survey, use this training and certification approach for EMT-Bs. We believe that CPR and SAED use should be taught and certified in one integrated class.

Second, EMT-Bs work side-by-side with First Responders (police, fire and rescue squad personnel). For two groups that work so closely together, it makes no sense to have two different training and certification programs and possibly protocols. To make matters worse, citizens, under the citizen defibrillation bill (N.J.S. 2A:62A-23 – 27), are trained by the same agencies as you propose for First Responders. The NJSFAC strongly supports uniformity of training and certification for pre-hospital BLS SAED standards through the use of the American Heart Association and the American Red Cross programs.

Third, the EMT-B course is not the correct place to certify SAED skills. Since an EMT-B student must possess a valid professional rescuer CPR card, this student will already be certified to use the SAED under the new national courses. It seems ridiculous to spend more course time to certify this student again. The national EMT-B curriculum includes a skills review

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of SAED use in Module 4. This is the same review that is done for CPR and obstructed airway. The EMT-B student does not graduate with a new CPR card because of the CPR and obstructed airway review in the Basic Course. We believe that the Basic Course is not the vehicle to certify the student for SAED use since the student is already certified. The EMT-B course should be used to enhance the student's already existing knowledge level and skills.

Fourth, EMT instructors are no longer required to be CPR instructors. CPR instructors are certified by national agencies to teach and test skills on a uniform national basis. We believe that the American Heart Association and American Red Cross are in a better position with existing teaching materials and appropriately trained instructors to teach and certify SAED use on a consistent basis.

Fifth, we can not support creating a new or different bureaucracy to administer SAED training and certification for EMT-Bs. In a memo from Acting Commissioner Christine Grant to Alan Kooney, dated May 10, 1999, regarding Assembly Appropriations Hearing Follow-up, on Page 1 she states:

“Because all EMTs will be expected to perform defibrillation, a course must be developed and funded to train those volunteer EMTs who have not yet mastered this life saving skill. This is estimated to cost \$100,000.”

In this time of limited resources, we don't think your Department should develop a redundant course and certification process when two national agencies already have developed recognized courses. We believe that your Department's time could be better spent on other public health issues.

Sixth, we object to putting the certification process into the EMT-B course on the grounds that under N.J.S. 27:5F-22, the NJSFAC has the right to set the training standards for volunteer squads. The NJSFAC has adopted EMT-B as its standard. We find no provision in the New Jersey Statutes that confers control of EMT-B training standards to your Department. Control of these training standards is subject to litigation currently before the Superior Court of New Jersey, Appellate Division (see attached letter of our Counsel).

Seventh, we oppose your “pilot program” of merging EMT-D training and certification into the EMT-B course in all locations. A pilot program is a test. Forcing all course sites to combine EMT-D and EMT-B into one course is not a test and is in violation of your own current regulations. We think that you should withdraw the current EMT-D regulations and replace them with short and simple regulations recognizing the American Heart Association, American Red Cross and the National Safety Council courses as providing the requisite training and certification. In the alternative, we believe that you should withdraw the current EMT-D regulations and seek a repeal of N.J.S. 26:2K-40, since it is no longer needed in light of the

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new training and certification programs provided by the American Heart Association, American Red Cross and the National Safety Council.

We agree with your proposal for First Responders and in effect we are saying that your proposal for First Responders is the same proposal we want to see for EMT-Ds. We believe that the difference between a First Responder-D and an EMT-D is that the EMT-B course should be used to enhance the student's already existing knowledge level and skills. The stumbling block to your proposal for First Responder-Ds and our proposal for EMT-Ds is N.J.S. 26:2K-40 (copy attached). The law requires the same thing for both First Responder-Ds and EMT-Ds. Under current law, it does not appear that the Commissioner can delegate her responsibility for certifying First Responder-Ds. What needs to happen is that the Commissioner should seek the repeal of N.J.S. 26:2K-39 et seq. and the related regulations. This section of law and related regulations are no longer needed in light of the new training and certification programs provided by the American Heart Association and the American Red Cross. Repealing this law and related regulations will pave the way for the implementation of your proposal for First Responder-Ds and our proposal for EMT-Ds.

In closing, I think we have the same goal, which is to increase the standard of care for pre-hospital BLS service. We need to standardize training for CPR and defibrillation and take advantage of work that has been completed on a national basis already. Let's move forward together to implement the American Heart Association and the American Red Cross courses as the standard program for SAED use by EMT-Bs and First Responders in the State of New Jersey. This will help to standardize training for all pre-hospital BLS providers.

Sincerely,

Mary Ann Ferrara, President

attachments

cc: Commissioner Christine Grant  
Dr. James N. Pruden, Chair Commissioner's EMS Council  
Commissioner's EMS Council Members1  
Advisory Council For Basic and Intermediate Life Support Services Training Members

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