



**SKAGIT COUNTY**  
**EMERGENCY MEDICAL SERVICES**  
2911 E College Way, Suite C • Mount Vernon, WA 98273 (360) 416-1830

**EMS & TRAUMA CARE COUNCIL ADVISORY BOARD**

February 21, 2024

Washington State Department of Health  
Attn: Catie Holstein  
P.O. Box 47853  
Olympia, WA 98504-7853

Re: Public Comment on WSR 24-03-061; EMS Chapter Rule Updates

Dear Catie,

In 2019, Skagit County EMS formalized a county-wide Ongoing Training and Evaluation Program (OTEP) in which 19 licensed aid agencies, 10 licensed ambulance agencies, 3 ESSOs, and approximately 400 credentialed EMS personnel currently participate. This approach has worked well for us and allows for a consistent and coordinated EMS ongoing training program in our county which has increased participation significantly.

**WAC 246-976-161** General education and skill maintenance requirements for EMS provider recertification.

(4) Education must include information and psychomotor skill maintenance opportunities relevant to all age groups and be appropriate to the level of certification. Topics required for both methods of recertification must include all of the following:

(m) Ambulance operations including concepts such as driving an emergency vehicle, stretcher handling, crime scene awareness, safety around air ambulances and landing zones.

Our concern is specifically with the addition of the emergency vehicle driving and stretcher handling topics underlined above. While we recognize the importance of this training, over half of the credentialed EMS personnel in Skagit County are affiliated with licensed aid agencies or ESSOs and therefore do not typically transport patients or handle stretchers. Additionally, fire-based agencies that conform to NFPA 1451 already provide Fire and Emergency Service Vehicle Operations Training and it is customary for automobile insurance carriers to require this training for agency personnel. Therefore, most Fire and EMS agencies already have a means to require and provide this training outside of EMS ongoing training.

With the addition of a number of other new required topics including Behavioral, mental health, and chemical dependency; Patient advocacy concepts, multicultural awareness education, etc. we believe that requiring emergency vehicle driver and stretcher handling training through EMS ongoing training is duplicative, creates significant logistical and liability challenges, and competes for already limited EMS training time in a system that relies heavily on volunteers.

We respectfully request that this topic be removed from the list of required EMS ongoing training topics **OR** the language be adjusted to apply only to licensed ambulance services who engage in transport **AND** exclude or allow variance for agencies who already provide the training on those topics in a format other than OTEP or CME.

Respectfully,

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Paul Ross, Chair  
Skagit Regional Health

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Lance Ford, Vice Chair  
Skagit County Fire District #8