



NORTH DAKOTA
DEPARTMENT of HEALTH

EMERGENCY PREPAREDNESS
AND RESPONSE SECTION
Division of Emergency Medical
Services and Trauma
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APPENDIX E



June 10, 2010

Administrative Rules Committee
North Dakota Legislative Council
State Capitol
600 East Boulevard
Bismarck, ND 58505-0360

Dear Chairman Klein,

Based on our discussion this morning regarding rules labeled **33-11-01.2-17 Response times**, the North Dakota Department of Health Division of Emergency Medical Services and Trauma would like to provide the following information.

There was concern voiced regarding West Fargo and Mandan and that they should be treated the same as the four other cities named in the rules. We agree with the comments that the response time should be applicable to the additional two communities. We contacted FM Ambulance Service and Metro Ambulance Service, and they both stated that they have no difficulty meeting the nine-minute response time standard in the additional cities. It was suggested that all similar-sized communities with advanced life support ambulances be required to achieve the nine-minute response time. It is our recommendation that the committee hold over this section of the rules to permit us to communicate with the affected ambulance services.

Concern also was expressed about the impact of the response time rules on volunteer ambulance services.

The ambulance run report data is as follows:

For Frontier Ambulances, their response time of less than 31 minutes occurs 98.33% of the time and 31 minutes or longer 1.67% of the time.

For Rural Ambulances, their response time of less than 21 minutes occurs 90.49% of the time and 21 minutes or longer 9.51% of the time.

The urban data is currently incomplete and we do have concerns with boundaries. We will provide the completed information to the committee at a future date.

Since this data illustrate compliance with this proposed rule, we do not anticipate it creating a hardship for volunteer ambulance services.

On pages 44 and 45 in the case of noncompliance under section **33-11-01.2-17.2 Response times:** Failure to meet response time standards when calculated in the two-year licensure period will require the ambulance service to develop a comprehensive plan of correction approved by the department which would include: (2a) an ambulance service must provide an analysis of the barriers to achieving the response time standards; (2b) a plan to remove or minimize all barriers that have been identified; (2c) place a notice in the official county newspaper notifying the public of the ambulance service response time deficiency in the format determined by the department.

We ask the committee to carry over the response time rules for approval at a future date and ask for approval of the remaining rules.

Please do not hesitate to contact me if further information is needed:

Sincerely,



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Division of Emergency Medical Services and Trauma

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