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From: Jaclyn.Gosnell@HCAHealthcare.com
Sent: Friday, February 5, 2021 1:59 PM
To: Rulescoordinator, Dhsr
Subject: [External] comment for proposed changes to EMS and Trauma Rules

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NCOEMS:

As the Chair of the NC State Trauma Program Manager Committee, I am submitting the following proposal to the trauma amendment changes on behalf of all the NC State Trauma Program Managers:

As a committee we would like to suggest holding on proposed changes until release and review of new ACS standards, "Resources For Optimal Care of the Injured Patient" (gray book) which will be released in March 2021. In the meantime, we would like to request NCOEMS to develop a formal subcommittee with adequate RAC and trauma center representation from all areas within NC, to complete a needs based assessment (NBAT or geospatial) as suggested by the 2004 ACS NC site review. The NC State TPM committee unanimously agrees quality of care and cost to patients should not be jeopardized through amendments. We also would like to request that pediatric trauma and burn become a NC state designation.

If the decision is made to not await publication of the new updated "Resources For Optimal Care of the Injured Patient" (gray book) we would like to suggest the following specifics.

- "NCAC.13P .0904 B3: Request to have a needs based assessment and to leave following statement "Criteria shall be met without compromising the quality of care or cost effectiveness to patients."
- NCAC13P.0904 C, request amendment from weekly submission to quarterly submission to align with NTDB data submissions. Also requesting no amendments to defined data points or defined as by the NC COT. Group concern for not submitting these data points is related to the inability to specifically assess injury burdens of catchment areas.
- NCAC13P .1101: Requesting no change to the current NCOEMS process for obtaining RAC affiliations. We feel this process works well now and fear the proposed amendments would jeopardize RAC relationships and unnecessary politics within our state and the pre-hospital agencies.

Respectfully,

Jackie Gosnell MSN, RN, TCRN, CEN
NC State Chair, Trauma Program Committee
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