



DEPARTMENT OF PUBLIC HEALTH

Emergency Medical Services Agency

POLICY #130

TITLE: EMS POLICY DEVELOPMENT, REVISION, DELETION AND IMPLEMENTATION

APPROVED: ON-FILE

EFFECTIVE DATE: 10/2017

EMS Administration: Kathleen Grassi, R.D., MPH

REVISION DATE: New Policy

ON-FILE

REVIEW DATE: 10/2020

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EMS Medical Director: Ajinder Singh, MD CPE

Authority: California Health and Safety Code, Division 2.5, and California Code of Regulations, Title 22 Social Security, Division 9 Prehospital Emergency Medical Services.

Purpose: To provide a mechanism for the development of, revision of, and deletion of EMS policies, procedures, and protocols. The development, revision, and deletion of any policy, protocol or procedure will be defined as a policy action. This policy will also encompass emergency policy actions.

Policy: Any person, provider, stakeholder may submit a request for a modification to any policy, procedure, and/or protocol. This request shall be provided in writing to the Merced County Emergency Medical Services (EMS) Agency.

1. The request should contain the following information:
 - a) Name of the requestor
 - b) Contact information (phone, email, etc.).
 - c) Representation (organization, self, association).
 - d) The explanation of the problem.
 - e) The reason the requestor believes a problem exists.
 - f) Recommended resolution options.
2. No prehospital provider shall institute patient care (clinical) policies, procedure and/or protocols that conflict with Merced County EMS clinical policies and/or protocols. This does not apply to treatment protocols and standard operating procedures developed by EMS air medical providers and Critical Care Transport (CCT) providers for their Registered Nurse (RN) or other higher level medical personnel.
3. The EMS Agency staff may review the request with appropriate parties and/or organizations.
4. Whenever possible, various advisory groups are provided the opportunity to provide comments to the EMS Agency prior to implementation.

Procedure:

1. Proposed policy actions (development, revision, and deletion) are drafted by Merced County EMS staff. Furthermore, EMS providers/stakeholders can submit proposals for the development, revision, and deletion of policy and protocols to the Merced County EMS staff for consideration.
2. Outside of the EMS Agency, an EMS Policy and Procedure subcommittee of the Merced County Emergency Medical Care Committee (EMCC) is established through the EMCC bylaws.
3. The purpose of the EMS Policy and Procedure subcommittee shall be to assist and advise the Emergency Medical Services Agency in the development, revision, deletion and implementation of Emergency Medical Services policies, procedures and guidelines.
4. Input on policy development, revision and deletion may be solicited from individuals, stakeholders, agencies, and/or advisory committees. This can occur at various stages of the policy action process (prior to and during public comment period).
5. Merced County EMS may establish an ad hoc committee, as necessary, to discuss selected policy actions.
6. Draft policies/protocols will be reviewed and revised by Merced County EMS staff as often as necessary throughout the process.
7. Approval process of policy actions will occur as follows:
 - a. Proposed or accepted policy actions will be placed on the Emergency Medical Care Committee (EMCC) agenda as an informational item at the next quarterly meeting.
 - b. Based on the nature of a proposed policy action, the EMS Agency may also hold an administrative review. Such review will include department/agency/company senior managers and EMS Agency staff and may be held at any time.
 - c. The proposed policy actions will be placed on the EMS Policy and Procedure subcommittee's agenda.
 - d. The EMS Policy and Procedure subcommittee will convene as needed to discuss the proposed policy actions.
 - e. Proposed policy actions will be reviewed and discussed. No final action will be taken the first time the proposed policy action is placed on the meeting agenda of the EMS Policy and Procedure subcommittee.
 - f. Once the proposed policy actions are discussed at the EMS Policy and Procedure subcommittee the Merced County EMS staff will incorporate recommendations into the draft, and place the revised policy/protocol on the subcommittee agenda for review and potential approval.

- g. Once approved at the subcommittee level the policy/protocol action will be posted for public comment. The notification of the public comment period will be sent out to all EMS stakeholders. The initial public comment period will be 30 days.
- h. Consistent with a policy of encouraging the widest possible notification and distribution to interested persons, Merced County EMS will:
 - i. Post proposed changes to policies or protocols on the Merced County EMS website.
 - ii. E-mail notification of proposed changes to members of the Emergency Medical Care Committee (EMCC) and EMS Policy and Procedure subcommittee.
 - iii. E-mail notification of proposed changes to each EMS service provider, hospital representatives, and appropriate stakeholders.
 - iv. E-mail notification of proposed changes to any person who has filed a request for notification with Merced County EMS.
 - v. The provisions of this section shall not be construed in any manner to invalidate a protocol or policy due to perceived inadequacy of the notice.
- i. EMS Agency staff will make policy drafts available for an open comment period of a minimum of thirty (30) days before adoption whenever possible.
- j. During open comment periods, all suggestions must be submitted electronically in writing to the EMS Agency. Each suggestion/comment will be posted to a master list and made available to all system participants for review.
- k. After the public comment period, all comments will be evaluated. The subcommittee will take appropriate action as deemed necessary.
 - l. Written responses to the comments will be posted on the Merced County EMS website.
 - m. If further recommendations are received, the proposed policy action can be placed on the EMS Policy and Procedure subcommittee agenda, as necessary, until the subcommittee reaches a consensus.

Routine Review of Existing Merced County EMS Policies/Protocols:

- 1. Each existing Merced County EMS clinical policy, protocol, and procedure should be reviewed at least every two (2) years. The administrative policies, protocols, and procedures can be placed on a three (3) year review cycle.
 - a) Policies/protocols may be reviewed on a more frequent basis if necessary due to regulatory, standard of care, or other changes.
 - b) The review date does not affect the validity of the policy or protocol. Policy and protocol remain in effect until superseded or rescinded.
 - c) The process indicated above will be used for the routine review of existing policies/protocols.
 - d) Implementation of policy actions will occur as follows:

- i. New policies, procedures and protocols will be assigned a Merced County EMS policy, procedure, and protocol number.
 - ii. An effective date and next review date will be assigned to all policies, procedures, and protocols.
 - iii. The EMS Medical Director and Director of Merced County EMS Agency will sign the policy/protocol. Signatures can be represented by the statement that originals are on file.
 - iv. Appropriate parties will be notified of the action.
2. Significant system-wide changes will be adopted in such a way that will ensure sufficient time for planning and training. This may include clinical protocols and orders, master plans, etc.
 3. Policy, procedure, and protocol updates may be released more frequently if necessary due to special or extenuating circumstances.

Emergency Policies and Protocols:

1. If Merced County EMS determines that an emergency policy or protocol is necessary for the immediate preservation of the public health and safety or general welfare, a policy or protocol may be changed as an emergency policy action.
2. Any finding of an emergency will include a written statement describing the specific facts showing the need for immediate action. The statement and the policy or protocol shall be immediately forwarded to Emergency Medical Care Committee, EMS Policy and Procedure subcommittee, and EMS providers/stakeholders.
3. Policies or protocols adopted under the emergency provision shall remain in effect until reviewed by the appropriate committee.
4. Some policy actions may require immediate action to maintain compliance with state regulation/law, or to preserve medical control/integrity of the EMS system. Policy actions of this type may be implemented by Merced County EMS as urgency measures, and scheduled for discussion, evaluation, and review at the next regularly scheduled Emergency Medical Care Committee and/or the EMS Policy and Procedure subcommittee meeting.
5. In general, policies will become effective no less than thirty (30) days after approval. Effective dates may vary based on the financial, regulatory, and operational impacts of the policy.

Minor Policy Revisions:

- a) The EMS Medical Director and/or Director of Merced County EMS Agency may authorize minor revisions to policy without public comment.
- b) Minor revisions will be limited to those policy changes that:
 - i. Do not have material financial, clinical, or operational impact on EMS system stakeholders and/or providers.

- ii. Correct minor typographical, grammar, spelling, and/or formatting issues.
- iii. Changes in wording necessary to clarify the objective.
- iv. Changes in the listed order or numbering necessary for clarity or flow.