

Ambulance Vehicle Design Specifications Revision

Nebraska EMS Leaders, Nebraska EMS Board, PMDs and Licensure Office:

As you are aware, currently Nebraska requires licensed ambulances to meet the U. S. General Services Administration (GSA) KKK-A-1822 Specifications for ambulance vehicle design. These specifications are being retired and Nebraska will need to revise the rules that incorporate these specifications. The National Association of State EMS Officials (NASEMSO) created an Agency & Vehicle Licensure Committee to develop model regulatory language for state adoption related to the design of ambulances for state promulgation as needed. The committee sent a request to the GSA to delay the retirement of the KKK-A-1822 specifications giving states the needed time to make necessary changes. This request was granted and they will not be retired until October 1, 2015.

In addition, this committee has reviewed the newly published National Fire Protection Association (NFPA)1917 Standards for ambulances. This would be an option for replacing the KKK-A-1822 Specifications but the committee has two major areas of concern. Because of these concerns, NASEMSO filed two Tentative Interim Amendments (TIAs) with the NFPA. The decision of whether the TIAs will be granted will be made by a higher level standards council in early March. The council will review public comments before making a decision on the TIAs. It is imperative that NFPA hear from the ambulance regulator and purchaser/user communities. Please read the email below and consider filing comments to the NFPA before February 13, 2013.

(You may find all of the items listed in the email below interesting but please review #1 and #2.) Please share this information with members of your department and governing officials. This survey has time sensitive deadline.

Thank you for your time and any comments you make.

Take Care
Dean Cole
Nebraska EMS/Trauma Program Administrator
P.O. Box 95026
Lincoln, NE 68509
402-471-0124 or 800-422-3460 ext 23

State EMS Directors, the NASEMSO Board of Directors and the NASEMSO Agency & Vehicle Licensure Committee Chair Brian Litza (WI) urge you to carefully review item number 2 below and consider filing public comment with the NFPA on behalf of your state EMS office. Further, they request that you send the message below (or at least items number 1 & 2) to your state EMS association(s), local EMS agency leaders, and any other parties encouraging public comment in favor of the Tentative Interim Amendments (TIAs) that NASEMSO filed. It is imperative that NFPA hear from the ambulance regulator and purchaser/user communities. The deadline is February 13, 2013. As always, please consider forwarding this to your staff member with primary responsibility for EMS agency licensure, and encourage their membership in the NASEMSO Agency & Vehicle Licensure (AVL) Committee.

Several changes have occurred related to the National Association of State EMS Officials (NASEMSO) Model Rules for Ambulance Vehicle Design (MRAVD) Project since the December update.

1. Tentative Interim Amendment (TIA) requests have been balloted with the National Fire Protection Association.

With assistance from the ambulance manufacturer industry and national associations representing ambulance purchasers and users, NASEMSO filed two TIAs requesting deletion of the requirement of a speed limiter set at 77 mph, and extensive revision to the section related to documentation exchanges between manufacturers and purchasers and limitations on purchasers about non-conforming ambulance use. In accordance with NFPA regulations, the TIAs have been published and voting looks favorable by the technical committee. The ballot closes on 1/18/13. The final determination of whether the TIAs will be granted will be made by a higher level standards council in early March. The council will review public comment about the TIAs; this opportunity is described under item #2. The International Association of Fire Chiefs representative sent a four page memo of support to the technical committee members. View the memo [here](#).

2. PUBLIC COMMENT PERIOD IS OPEN on the TIAs UNTIL FEBRUARY 13, 2013

To view the TIA on the Statement of Exceptions and access a link to file comments (on page two) click [here](#). NASEMSO's goal was to simplify this section, assure that adequate documentation is available for state ambulance inspection processes, and eliminate a restriction on the ambulance purchaser about when they could put the vehicle into emergency use. On the latter point, it is NASEMSO's position that this is up to the states that regulate ambulance vehicles, not the ambulance purchaser or the publisher of specifications.

To view the TIA on the speed limiter and access a link to file comments (at the bottom of the page) click [here](#). It is NASEMSO's position that determination of the maximum speed at which an ambulance can travel is a matter of state law, not a vehicle design specification. Multiple electronic methods of monitoring, controlling, and/or alerting local agency officials about speed violations are available. Ideally any accredited standards development organization's specifications would address all of these options that can be selected by the purchaser. The decision to mandate the use of one or more of these systems is a function of states that regulate ambulance vehicles and operations.

3. NFPA is forming a workgroup to provide substantive comment to the NFPA 1917 revision process.

NASEMSO has filed a request with NFPA to establish a short term workgroup to provide substantive comment to the NFPA 1917 Technical Committee when it initiates the revision process, into which NFPA 1917 was immediately placed and scheduled for completion in 2015. This group, which will be comprised of a subset of the MRAVD project team members, will provide more detailed review and comment on the remaining 40+ components of NFPA 1917 which differ from the KKK and ASTM International specifications with a priority focus on components related to safety and a desire for cosmetic or non-evidence based characteristics to be deleted or moved to an annex of optional features. The NASEMSO representatives to this workgroup will include state EMS directors Jay Bradshaw (ME), Dennis Blair (AL), and one more state EMS official from the Model Rules for Ambulance Vehicle Design (MRAVD) project team.

4. **The General Services Administration granted NASEMSO's request to delay cancellation of the KKK Specifications until October 1, 2015.**

Correspondence approved by the NASEMSO Board of Directors was sent to the [General Services Administration Automotive](#) Director on December 7 requesting a delay of cancellation of the Federal Star of Life Ambulance Vehicle Specification until October 1, 2015. An affirmative response was received on December 11. This creates a temporary but important relief valve for states that have incorporated the [KKK specifications](#) in whole or part in state regulations. The correspondence is posted [here](#).

5. **The NASEMSO AVL Committee will be drafting model rules related to ambulance vehicle design beginning in March 2013.**

In anticipation of the needs of states that have incorporated the KKK specifications in regulations ([link to map](#)) NASEMSO has committed to developing model rules for states' use when repealing the reference to KKK. The timeline to develop this language has been relaxed slightly, and will benefit from anticipated research findings and more detailed reviews of actual/potential language published or being revised by accredited standards development organizations.

Regards,



Dia Gainor, MPA

Executive Director

National Association of State EMS Officials

201 Park Washington Court | Falls Church, VA 22046 | (208) 861-4841 | FAX (703) 241-5603

dia@nasemso.org | www.nasemso.org