

Written Comments on EMS Policy No. 2101 EMS Dispatcher Certification
 30 Day Public Comment Period
 January 8, 2008

SECTION # PAGE #	ORGANIZATION	COMMENT	RESPONSE
I. A. 6.	Stockton Fire Dept	“The SFD requests that the EMSA explain or provide, in detail, the orientation to local policies, protocols, etc. for our personnel. All current are very experienced with local policy and have undergone similar training in the past. Does this satisfy the requirement? The SFD requests clarification on this issue and the estimated orientation time needed to enact this direction.”	Orientation is designed to familiarize personnel with changes to EMS policies and procedures; and to address areas identified by the CQI process as requiring review. A provision stating that orientation will not exceed 8 hours will be added to ensure consistency with other EMS personnel processes.
I. A. 6.	Stockton Fire Dept	“For the MCI Operations Course, the EMSA has designated LifeCom [sic] as the notification center for MCI’s in San Joaquin County. Does the EMSA now intend to have ECD perform this function within the jurisdictional dispatch boundaries of the SFD? If not, this requirement is excessive as ECD personnel would not be functioning in this capacity. The SFD requests that this requirement be modified accordingly.”	Agree. The topic of the SFD communications center’s role in multi-casualty incidents can be addressed during the orientation to local policies and procedures.
I. A. 8.	Stockton Fire Dept	Section 1798.200 [citation omitted]. “Under this provision, the statute provides for an administrative process for highly trained, certified or licensed personnel, not EMS Dispatchers. The SFD recommends that the EMSA develop a well tailored affidavit and application process for this issue which does not conflict with labor, privacy laws and specific memorandums of Understandings (MOU) of SFD employees.”	Disagree. EMS dispatcher certification should be held to the same high standards as other EMS personnel licenses and certifications.
I. A. 9.	Stockton Fire Dept	“The SFD has contacted the EMSA by telephone and researched their website and is unable to ascertain what the fee amount is. The SFD requests that the fee be published in a manner which is reasonable to obtain for all providers to comment on.”	The fee for EMS dispatcher certification has not been established.

Written Comments on EMS Policy No. 2101 EMS Dispatcher Certification
 30 Day Public Comment Period
 January 8, 2008

SECTION # PAGE #	ORGANIZATION	COMMENT	RESPONSE
II. A. 5. b.	Stockton Fire Dept	“As an emergency first responder, ECD personnel are best suited to perform ride time with SFD resources in order to gain experience with local geography, hospital locations, new areas of construction, etc. The SFD requests that this requirement be modified accordingly.”	This requirement is decreased from 8 hours to 4 hours and modified to allow observation ride time with any authorized ALS provider.
II. A. 6.	Stockton Fire Dept	“This requirement is not consistent with the provisions contained with the established guidelines of the National Academy [sic] of Emergency Dispatch (NAED) for award of and maintenance as a ‘Center of excellence.’ The provisions adopted by NAED are collectively [sic] in nature for the Center as a whole and do not allow for ‘individual’ EMD-Q compliance scores. The SFD suggests that EMSA resolve this discrepancy by following NAED requirements as the standard benchmark.”	Disagree. Individual EMS dispatcher EMD-Q scores are used to develop the overall center’s EMD-Q score. By reviewing both individual and center scores EMS dispatchers performing below the center median score or NAED standards can be identified and receive remediation. Omitting individual score from review would allow poorly performing EMS dispatchers to continue working ad infinitum.
II. B.	Stockton Fire Dept	“Notwithstanding any provision of current labor law, non-compliance with existing Memorandum of Understanding (MOU) or applicable employee rights, this section should reflect a cooperative effort between the provider and the EMS for specific training requirements, if applicable. The SFD requests that this requirement be modified accordingly.	Disagree. All EMS personnel regardless of the type of license or certification are accountable to the medical control requirements of the local EMS agency medical director. H&S Code § 1797.220 and 1798. et seq.