July 21, 2014

Standard Occupational Classification Policy Committee
U.S. Bureau of Labor Statistics, ,
2 Massachusetts Avenue NE., Suite 2135
Washington, DC 20212

Subject: 2018 Standard Occupational Classification Revision Process Input

Standard Occupational Classification Policy Committee Members:

The Joint National EMS Leadership Forum (JNEMSLF) is a group of federal agencies and 18 national organizations which support and represent professionals and agencies responsible for the delivery of emergency medical services (EMS) across our country. The JNEMSLF meets regularly to work collaboratively on issues of national importance impacting the provision of EMS at the community level and as part of our nation's disaster preparedness and response activities.

The 14 JNEMSLF members whose association logos appear above propose changes to the broad group of emergency medical technicians (EMTs) and Paramedics (29-2040) and creation of new detailed occupations under the broad group of EMTs and Paramedics (29-2040) to replace the existing detailed occupation EMTs and Paramedics (29-2041). Additionally the JNEMSLF proposes the creation of new detailed occupations under the broad group of Firefighters (33-2010) to replace the existing detailed occupation Firefighters (33-2011).

The JNEMSLF has identified two primary concerns in the current structure used to collect these data that result in critical EMS related work place data being seriously under reported:

- Presently the Bureau of Labor Statistics combines personnel functioning in the separate roles of emergency medical technician (EMT) and Paramedic into the same statistical category for the purposes of federal employment data. The "*BLS Occupational Employment Statistics*" report combines the wage data and workforce totals, and projected demand with no differentiation between EMTs and Paramedics. However, EMTs and Paramedics have **VERY** different education and training requirements, responsibilities for patient care, engagement in the EMS system, and compensation levels.
- The *Occupational Outlook Handbook* produced by the Bureau of Labor Statistics (Bureau) is used by high school counselors across the nation to guide youth in selecting career options. The handbook utilizes the BLS data regarding wages. The reasonable wage a student could expect to earn as a paramedic is underreported due to wage data combining EMT and Paramedic wages. Paramedics generally earn significantly more than EMTs. Consequently, counselors may be less likely to recommend a career as a paramedic and students may be less likely to pursue such a career path. The total number of personnel the Bureau considers in the EMS workforce is also underreported due to the exclusion of volunteers who provide critical EMS services. Although volunteers who are injured or killed in the line of duty are reported as part of the national data collection process, volunteers are not counted as part of the EMS workforce. Workplace injury and death rates are therefore flawed and comparisons to other vocations injury and death rate are likewise flawed. This aspect alone impacts insurance ratings as well as worker compensation issues.

The JNEMSLF members whose association logos appear above recommend the following changes to the SOCPC:

CURRENT

29-2040 Emergency Medical Technicians and Paramedics

This broad occupation is the same as the detailed occupation:

29-2041 Emergency Medical Technicians and Paramedics

Assess injuries, administer emergency medical care, and extricate trapped individuals. Transport injured or sick persons to medical facilities.

Illustrative examples: EMT, Flight Paramedic

PROPOSED

29-2040 Emergency Medical Services Practitioners, Except Firefighters

This broad occupation includes the following three detailed occupations:

29-2041 Emergency Medical Technicians

29-2042 Paramedics

29-2043 Emergency Medical Services Practitioners, All Other

29-2041 Emergency Medical Technicians
Assess injuries and illnesses and administer basic emergency medical care, and extricate trapped individuals. Transport injured or sick persons to medical facilities onboard ambulances. Excludes "Firefighters", "Ambulance Drivers and Attendants, Except Emergency Medical Technicians", "Paramedics" and "Emergency Medical Services Practitioners, All Other".

Illustrative examples: EMT, EMT-Basic

29-2042 Paramedics
Provide advanced emergency medical care and transportation. Paramedics function under medical oversight. Perform interventions with the basic and advanced equipment typically found on an ambulance. Must graduate from an accredited educational program for paramedics. Excludes "Firefighters", "Ambulance Drivers and Attendants, Except Emergency Medical Technicians", "Emergency Medical Technicians" and "Emergency Medical Services Practitioners, All Other".

Illustrative example: Paramedic, Flight Paramedic

29-2043 Emergency Medical Services Practitioners, All Other
All emergency medical services practitioners not listed separately. Excludes "Firefighters", "Ambulance Drivers and Attendants, Except Emergency Medical Technicians", "Emergency Medical Technicians" and "Paramedics".

Illustrative examples:, Advanced EMT, Emergency Medical Responders

29-20XX Supervisors of Health Technologists and Technicians

29-20XX First-Line Supervisors of Emergency Medical Services Practitioners

This broad occupation is the same as the detailed occupation:

29-20X1 First-Line Supervisors of Emergency Medical Services Practitioners

29-20X1 First-Line Supervisors of Emergency Medical Services Practitioners
Directly supervise and coordinate activities of practitioners engaged in emergency medical services.

Illustrative examples: EMS Lieutenant, EMS Field Supervisor, Paramedic Supervisor, Field Training Officer

CURRENT

33-2010 Firefighters

This broad occupation is the same as the detailed occupation:

33-2011 Firefighters

33-2011 Firefighters
Control and extinguish fires or respond to emergency situations where life, property, or the environment is at risk. Duties may include fire prevention, emergency medical service, hazardous material response, search and rescue, and disaster assistance.

Illustrative examples: Fire Engine Pump Operator, Forest Firefighter, Marine Firefighter, Smoke Jumper

PROPOSED

33-2010 Firefighters

This broad occupation includes the following three detailed occupations:

33-2011 EMT Firefighters

33-2012 Paramedic Firefighters

33-2013 Firefighters, All Other

33-2011 EMT Firefighters
Control and extinguish fires and respond to emergency situations where life, property, or the environment is at risk. Assess injuries and illnesses and administer basic emergency medical care, and extricate trapped individuals. Transport injured or sick persons to medical facilities onboard ambulances.. Duties may include fire prevention, emergency medical service, hazardous material response, search and rescue, and disaster assistance. Excludes "Emergency Medical Services Practitioners, Except Firefighters"

Illustrative examples: Firefighter EMT

33-2012 Paramedic Firefighters
Control and extinguish fires and respond to emergency situations where life, property, or the environment is at risk. Provide advanced emergency medical care and transportation. Paramedic Firefighters function under medical oversight. Perform interventions with the basic and advanced equipment typically found on an ambulance or fire apparatus. Must graduate from an accredited educational program for paramedics.. Duties may include fire prevention, emergency medical service, hazardous material response, search and rescue, and disaster assistance. Excludes

"Emergency Medical Services Practitioners, Except Firefighters" Excludes "Emergency Medical Services Practitioners, Except Firefighters"

Illustrative examples: Firefighter Paramedic, Fire Medic

33-2013 Firefighters, All Other
Control and extinguish fires or respond to emergency situations where life, property, or the environment is at risk. Extricate trapped individuals and transport injured or sick persons to medical facilities onboard ambulances Duties may include fire prevention, emergency medical service at the first responder level, hazardous material response, search and rescue, and disaster assistance. Excludes "Emergency Medical Services Practitioners, Except Firefighters"

Illustrative examples: Fire Engine Pump Operator, Forest Firefighter, Marine Firefighter, Smoke Jumper

The U.S. Census Bureau gathers data regarding volunteer activities in America. Presently, the category in which EMS personnel are included combines several endeavors into one category including “counseling, medical care, fire/ems or protective services”. This category does not allow for adequate reporting of the number of volunteer EMS personnel serving our nation. The failure to accurately capture this data also limits our understanding of the workforce demands for the future. It is estimated that 300,000 volunteers staff ambulance services across the country.

The JNEMSLF requests the opportunity to work with the SOCPC to consider how these aspects of data collection can be clarified and enhanced to obtain a more accurate picture of our nation’s EMS workforce.

Thank you for your consideration of the following:

Nature of work performed. The Joint National EMS Leadership Forum has proposed revisions to the existing occupations of Emergency Medical Technicians and Paramedics (29-2041) and Firefighters (33-2011). The work described in the current Standard Occupational Classification definitions is not accurate and up to date.

The 2007 *National EMS Scope of Practice Model* serves as “a guide for States in developing their Scope of Practice legislation, rules, and regulation. […]The National EMS Scope of Practice Model defines and describes four levels of EMS licensure: Emergency Medical Responder (EMR), Emergency Medical Technician (EMT), Advanced EMT (AEMT), and Paramedic. Each level represents a unique role, set of skills, and knowledge base. […] For the purpose of this model, one licensure level is substantially different from other licensure levels in:

• Skills

• Practice environment

• Knowledge

• Qualifications

• Services provided

• Risk

• Level of supervisory responsibility

• Amount of autonomy

• Judgment/critical thinking/decision making."[1]

According to the *National EMS Scope of Practice Model* "[t]he primary focus of the Emergency Medical Technician is to provide basic [underline added] emergency medical care and transportation for critical and emergent patients who access the emergency medical system. This individual possesses the basic knowledge and skills necessary to provide patient care and transportation. […] Emergency Medical Technicians perform interventions with the basic equipment typically found on an ambulance." In contrast the *National EMS Scope of Practice Model* further states "[t]he Paramedic is an allied health professional whose primary focus is to provide advanced [underline added] emergency medical care for critical and emergent patients who access the emergency medical system. This individual possesses the complex knowledge and skills necessary to provide patient care and transportation. […] Paramedics perform interventions with the basic and advanced equipment typically found on an ambulance."

The procedures and skills within the scope of practice of the Emergency Medical Technician (EMT) are generally non-invasive such as bleeding control, positive pressure ventilation with a bag valve mask, oropharyngeal airway, supplemental oxygen administration, splinting, spinal immobilization and CPR.

The procedures, skills and assessments required of the Paramedic are considered "advanced" level medical services versus the "basic" level of those of the EMT. Paramedic functions build on the training of the EMT and expand into invasive procedures such as intravenous therapy, medication administration, advanced airway management, EKG interpretation and advanced assessment abilities. The Paramedic is considered a medical professional who provides medical care to sustain life in the pre-hospital environment, usually in an emergency, at the point of illness or injury. [2]

1. **How the work performed is distinct from other occupations**.

   The procedures and skills performed at the EMT level are generally non-invasive while the work of the paramedic includes advanced procedures typically associated with physician or

[1] NHTSA, *National EMS Scope of Practice Model,* 2007. http://ems.gov/education/EMSScope.pdf
[2] NHTSA, *National EMS Scope of Practice Model,* 2007.

nursing level personnel. The JNEMSLF has also recommended that the single detailed occupation code Firefighters (33-2011) be replaced with three new detailed occupation codes: EMT Firefighters (33-2011), Paramedic Firefighters (33-2012) and Firefighters, All Other (33-2013). This change will more accurately reflect the EMS work performed by firefighters nationally. According to the Occupational Outlook Handbook "[f]irefighters must usually be certified as emergency medical technicians at the EMT-Basic level. In addition, some fire departments require firefighters to be certified as an EMT-Paramedic."

2. **Job titles**.

(A) Emergency Medical Technician (EMT) has several different titles dependent on state laws and regulations. Titles include EMT-Basic, , Advanced EMT, but all of these are derivations from the primary function of the EMT.
(B) Paramedic, with some minor regional and functional derivations in titles such as critical care paramedic, mobile intensive care paramedic etc. but all of these are derivations to the primary function of the Paramedic.

3. **Indications of the number of jobs or workers in the occupation**.

The *2011 National EMS Assessment* produced by the Federal Interagency Committee on Emergency Medical Services (FICEMS) in collaboration with NHTSA "estimated that the States issued 203,807 Paramedic licenses and 547,793 EMT licenses in 2010.[3]

4. **Types of employers**.

Public and private sector ambulance services, fire departments, hospitals. military, clinics, occupational health, community settings.

5. **Education and training**.

The Emergency Medical Technician (EMT) is both a singular profession and the first step (entry level) required for a person to become a Paramedic. EMT and Paramedic training is defined by a body of curricula produced through the U.S. Department of Transportation, National Highway Traffic Safety Administration, Office of Emergency Medical Services. The materials include various curricula for the EMT and Paramedic as well as supporting materials such as *EMS Education Agenda for the Future.*

The EMT training course is typically 110 -150 hours, approximately 6-8 college credit hours. The Paramedic course work is typically 1,200 – 1,800 hours including both classroom

[3] FICEMS, *2011 National EMS Assessment*, 2011.

instruction as well as substantial clinical experience in various hospital departments and service as an intern Paramedic. The Paramedic education program is typically a 12-14 month certificate, which is part of a 2-year associate's degree level experience.

Paramedic education is further defined nationally by the Committee on Accreditation of Educational Programs for the Emergency Medical Services Professions (part of the Commission on the Accreditation of Allied Health Education), as well as through the certification examinations produced by the National Registry of Emergency Medical Technicians and used by 46 states as the entry point for certification/licensure consideration.

6. **Licensing**.

   All States, incorporated U.S. territories and the District of Columbia require licenses to practice as an EMT or Paramedic. Every State has a State EMS Office that is either responsible for licensing EMS personnel or coordinates this function with another office of State government.

   The scopes of practice of EMTs and paramedics are defined by individual States. In general the States follow the suggested licensure levels delineated in the National EMS Scope of Practice Model. These levels are Emergency Medical Responder (EMR), Emergency Medical Technician (EMT), Advanced EMT (AEMT) and Paramedic.[4]

7. **Tools and Technologies**. For EMT's - splints, oxygen equipment, spine boards, bleeding control supplies. For Paramedics - IV materials, emergency medications, invasive airways, EKG diagnostic and cardiac treatment equipment.

8. **Professional or trade associations and unions**. Professional associations include the National Association of Emergency Medical Technicians, the International Association of Flight Paramedics and others. There are several labor unions related to EMTs, Paramedics, EMT Firefighters, Paramedic Firefighters and other EMS practitioners. Examples include the International Association of Fire Fighters and the EMS Labor Alliance. Data collected by the Longitudinal EMT Attributes and Demographics Study (LEADS) from 1999-2005 indicated that approximately 24% of EMTs belonged to a union versus approximately 37% of Paramedics.[5] The National Registry of Emergency Medical Technicians (NREMT) serves as the national EMS certification agency. Most States requires NREMT certification as a prerequisite for licensure as an EMT or Paramedic.

[4] NHTSA, *National EMS Scope of Practice Model,* 2007.
[5] NHTSA, *EMS Workforce for the 21st Century: A National Assessment*, 2008.

Thank you for your favorable consideration of these recommendations. If you have any questions, please contact Dia Gainor via dia@nasemso.org or 208-861-4841.

Sincerely,

American Ambulance Association

American College of Emergency Physicians

Association of Air Medical Services

Association of Critical Care Transport

International Academies of Emergency Dispatch

International Association of Fire Chiefs

International Association of Fire Fighters

International Trauma Life Support

National Association of EMS Educators

National Association of EMS Physicians

National Association of EMTs

National Association of State EMS Officials

National EMS Management Association

National Volunteer Fire Council