

August 9, 2021

Governor Greg Abbott
Office of the Governor
P.O. Box 12428
Austin, Texas 78711-2428

Re: Public Health Emergency Waivers Related to EMS

Dear Governor Abbott:

I am writing on behalf of the Texas EMS Alliance (TEMSA) to provide comments related to the recent announcement to end the EMS waiver related to Covid-19 on September 1, 2021. TEMSA was founded in 2015 to serve as the stakeholder voice for Texas EMS agencies, and the organization represents all types of EMS delivery models in communities across the state.

EMS agencies continue to be on the front lines of the health care industry's COVID-19 response, and Texas' EMS-related waivers for Covid-19 have been vital to ensure that ambulances can literally stay on the road to respond to calls. Many EMS agencies, particularly in rural areas, were already facing staffing shortages before the pandemic but the public health emergency has made a bad situation infinitely worse. The recent Delta wave has created staffing challenges that are even more dire than the staffing issues that we faced in the initial COVID-19 waves in 2020 and early 2021. The reasons for the extreme shortage in EMS workers are many:

- Lack of EMS training programs, especially in rural Texas
- Lack of training sites allowing EMS students to obtain required clinical hours due to pandemic as hospitals decline to allow students on campus
- Loss of EMS personnel to hospitals, as hospitals ease the nursing shortage by hiring EMS medics
- EMS personnel leaving the field due to fear of exposure to themselves and their families
- EMS personnel missing work due to exposure or illness
- Increased time on task for every transport related to infection precautions, requiring more staff for the same call volume
- Closures of rural hospitals, requiring longer transports taking ambulances out of their service areas for extended times.
- EMS personnel leaving the field simply due to extreme burnout from all the above factors

For one county-based EMS agency in Central Texas, 25 percent of its ambulances are unstaffed 80 percent of days. A hospital-based service in east Texas has lost twenty percent of its workforce in the last three weeks. A large EMS provider that provides 911 service to many Texas communities has found virtually no available work

force, despite pay increases and sign-on incentives. This is a situation playing out at agencies across Texas, especially in rural areas.

The waiver that allows state certified EMTs and paramedics to partner with non-certified drivers has allowed many Texas EMS agencies to leverage medical personnel to staff ambulances. For many EMS agencies in Texas, the waiver has allowed the utilization of non-certified drivers to temporarily partner with state-certified EMTs and paramedics to keep ambulances on the road to provide essential 911 and hospital-to-hospital ambulance service. Texas EMS agencies are working to help these non-certified staff members complete training to become certified as quickly as possible, but, as mentioned above, training to achieve certification has become much more difficult to complete.

September 1st is not the time to lift the waivers. As we indicated in our letter to you on May 27, 2021, the waivers have allowed EMS agencies to keep ambulances on the road with staff. As I write this letter, the wave is continuing to grow in Texas, and our staffing shortages will not get easier over the next few weeks. Governor Abbott, we are not forecasting a crisis; the crisis is already here.

Lifting the staffing waiver is exacerbating an already dangerous situation. We understand the waivers were always intended to be a temporary solution, and we all look forward to the day when they will no longer be necessary, but for the foreseeable future, Texas EMS agencies truly need the relief provided by those waivers. As a result, we ask that you extend the waiver until September 1, 2022, so that our ambulance agencies can focus on this current wave and provide training to as many of the non-certified personnel as possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Mincy".

Jeff Mincy
President
Texas EMS Alliance