



August 12, 2024

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

RE: Proposal for 2028 SOC Revision Process, FR Doc. 2024-12825

Dear Members of the Standard Occupational Classification Policy Committee:

On behalf of the hundreds of thousands of Emergency Medical Services (EMS) practitioners we represent from all 50 states and all US territories, we welcome the opportunity to provide input as part of the 2028 Standard Occupational Classification (SOC) revision process to ensure that all EMS personnel are accurately counted.

EMS is provided in a variety of settings based on a variety of service delivery models¹ including:

- Fire-based model
- Municipal third-service model

¹ https://www.ems.gov/assets/EMS_and_911_Resource_Guide.pdf

- Public utility model
- Hospital-based model
- Private nonprofit or private for-profit model

We appreciate the SOC Policy Committee including in the 2018 revision our recommendation to differentiate between Emergency Medical Technicians (EMTs) and Paramedics. This was an important step in ensuring an accurate picture of EMS workers. However, additional clarification is needed to achieve a comprehensive view of EMS.

The current SOC structure has led to an undercounting of EMS personnel of at least 795,000 due to the exclusion of dual-role firefighter/EMS personnel. To appropriately count the total number of EMS practitioners, the Bureau of Labor Statistics (BLS) must account for the fact that a significant portion of EMS practitioners also serve as firefighters, performing both sets of duties as their primary role. In these cases, firefighters are EMS personnel, and fire departments are EMS agencies. For the vast majority of jurisdictions across the nation, the terms “firefighter” and “EMS practitioner” are synonymous.

Those dual-role practitioners must be appropriately categorized as Firefighter/EMTs or Firefighter/Paramedics to enable us to track gaps in emergency services and to meet the emergency healthcare needs of communities, including planning for daily needs, major disasters, and public health emergencies.

Below is our input on the questions posed in the Federal Register notice (FR Doc. 2024-12825) posted on June 11, 2024.

Proposed Occupation Titles

This proposed change is based on the 2018 SOC Definitions².

33-2011 Firefighters

Perform a wide variety of tasks and functions in support of fire suppression, emergency medical care, fire prevention, hazardous materials, and other emergency services.

Respond to emergency and non-emergency incidents; provide appropriate services as required including emergency rescue and fire suppression; perform search and rescue for trapped or injured persons; perform emergency medical and first responder care as needed; prepare reports regarding emergency incidents as assigned.

Operate numerous types of rescue, emergency, and fire suppression equipment and apparatus as necessary; operate, inspect, repair and perform other technical tasks related to maintaining the apparatus, equipment, and facilities in the area of assignment.

Assist with transportation of patients to medical care facilities; evaluate the condition of patients and assess pertinent information about medical history and injuries; determine

² https://www.bls.gov/soc/2018/soc_2018_definitions.pdf

treatment in accordance with appropriate level of medical training and prepare patient care reports.

Participate in cleaning and maintaining facilities, grounds, equipment, and apparatus; ensure that appropriate conditions are maintained at assigned facility; ensure that all equipment and apparatus is in a constant state of readiness for emergency calls.

Participate in a variety of fire prevention operations, activities and programs including training; fire investigations; code enforcement and equipment operation and maintenance; participate in activities and operations in response to natural disasters, major accidents, incidents involving hazardous materials, and other emergency situations; identify, analyze and avoid hazardous and dangerous situations.

Respond to hazardous materials incidents; to perform defensive or offensive activities which will be dependent upon levels of certification in accordance with state and federal regulations; maintain knowledge and training about hazardous materials.

Use departmental computer equipment to input, review and access records, information, and other various data. Perform other related job duties and related job tasks as assigned by supervisory staff.

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

33-2012 Firefighter/EMTs

Performs all duties outlined in Fire Fighter job description and furthermore, is responsible for performing emergency medical and first response care at the EMT scope of practice level. This position may also respond to emergency and non-emergency incidents in a transport-capable motor vehicle, and treat and transport patients to the hospital.

Prepare patient care reports.

Drive and operate an ambulance in emergency and non-emergency incidents.

Illustrative examples: Firefighter/EMT

33-2013 Firefighter/Paramedics

Performs all duties outlined in Fire Fighter job description and furthermore, is responsible for performing advanced emergency medical and first response care at the Paramedic scope of practice level.

This position may also respond to emergency and non-emergency incidents, assess, treat, and transport patients, and transfer patient care to another medical care worker of equal or higher scope of practice if necessary.

Prepare patient care reports.

Drive and operate an ambulance in emergency and non-emergency incidents.

Illustrative examples: Firefighter Paramedic, Paramedic Firefighter

Description of the Nature of the Work Performed

A Firefighter who is not cross-trained as an EMT or Paramedic provides only first response life support when needed in a medical emergency. To provide care beyond first response life support, a firefighter must be cross-trained as an EMT or a Paramedic.

The primary focus of the Emergency Medical Technician is to provide basic 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 function as part of a comprehensive EMS response, under medical oversight. Emergency Medical Technicians perform interventions with the basic equipment typically found on an ambulance. The Emergency Medical Technician is a link from the scene to the emergency health care system. One of the eligibility requirements for licensure at this level requires successful completion of an accredited Emergency Medical Technician course.

A Firefighter who is cross-trained as an EMT can perform CPR, artificial ventilations, oxygen administration, basic airway management, defibrillation using an AED, spinal motion restriction, monitoring of vital signs, and bandaging/splinting. They may also administer certain medications, including nitroglycerin, glucose, epinephrine, naloxone, and albuterol, in special circumstances.³

The Paramedic is an allied health professional whose primary focus is to provide advanced 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 advanced assessment, patient care and, when required, transportation. Paramedics function as part of a comprehensive EMS response, under medical oversight. Paramedics perform interventions with the basic and advanced equipment typically found on an ambulance or advanced life support first response vehicle. The Paramedic is a link from the scene into the health care system. Because of the amount of complex decision making, one of the eligibility requirements for licensure requires successful completion of a nationally accredited Paramedic program at the certificate or associates degree level.

³ <https://naemt.org/about-ems>

A Firefighter who is cross-trained as a Paramedic has extensive training in patient assessment and care, and participates in a variety of clinical experiences during training. They can perform all of the skills performed by an EMT, plus advanced airway management such as endotracheal intubation, electrocardiographs (ECGs), insertion of intravenous lines, administration of numerous emergency medications, and assessment of ECG tracings and defibrillation.⁴ Firefighter/Paramedics also have an expanded scope of practice, allowing them to administer a broader range of medications to patients.

Description of the Relationship to Other SOC Occupations

The proposed Firefighter/EMT and Firefighter/Paramedic occupations are related to two existing SOC occupations:

1. 29-2040 Emergency Medical Technicians and Paramedics – The proposed definition of Firefighter/EMT includes the duties of “29-2042 Emergency Medical Technicians.” The proposed definition of Firefighter Paramedic includes the duties of “29-2043 Paramedics.”
2. 33-2010 Firefighters – The proposed definition of both Firefighter/EMT and Firefighter/Paramedic include the duties of “33-2011 Firefighters.”

As noted above, the Firefighter/EMT and Firefighter/Paramedic occupations are distinct from the other detailed occupations in the SOC because these workers perform the duties of both Firefighter and EMT or Firefighter and Paramedic.

Job Titles

Many fire departments already distinguish between Firefighter, Firefighter/EMT, and Firefighter/Paramedic. These titles are fairly standard across the United States. However, for purposes of SOC classification, these positions are all likely categorized as “Firefighters.”

Indications of the Number of Jobs or Workers in the Proposed Occupation

In 2020, the National Association of State EMS Officials (NASEMSO) – with support from the U.S. Department of Transportation, National Highway Traffic Safety Administration, Office of Emergency Medical Services – released the 2020 National Emergency Medical Services Assessment⁵. With responses from all 50 states as well as Guam, the Northern Mariana Islands, and the U.S. Virgin Islands, this assessment showed 1,052,842 licensed EMS professionals in the United States, approximately 917,000 of whom are EMTs or Paramedics. In contrast, the May 2020 BLS data⁶ shows 257,700 EMTs and Paramedics. *This reflects an undercounting of more than 795,000.*

⁴ Ibid.

⁵ https://nasemso.org/wp-content/uploads/2020-National-EMS-Assessment_Reduced-File-Size.pdf

⁶ <https://www.bls.gov/oes/2020/may/oes292040.htm>

Types of Employers

Employers for the proposed occupation titles are fire departments that provide EMS services. According to the U.S. Fire Administration, of the nation's more than 30,000 fire departments⁷:

- 60.9% of fire departments provide Basic Life Support
- 40.4% of fire departments provide Emergency Medical Services (EMS) non-transport response
- 21.7% of fire departments provide Advanced Life Support
- 21.1% provide EMS ambulance transport

Many fire departments provide multiple types of EMS services. In fact, over the past four decades, EMS has become a core function of the American fire and emergency service. According to data from the National Fire Protection Association (NFPA), in 2021, nearly three-quarters of all 9-1-1 calls to fire departments were for medical emergencies⁸. These 26.3 million responses have pushed the fire service to become the largest providers of EMS nationwide.

Education and Training, Licensing

Firefighters typically need a high school diploma. They must also pass written and physical tests, complete interviews, and train at a fire academy to earn nationally accredited certifications and licenses.⁹ Additional training requirements may vary based on jurisdiction and fire department. Most career fire departments also include EMS training at the EMT level as part of an individual's initial training before becoming a probationary firefighter. Firefighters may need additional training, higher education, and other certifications to qualify for further promotions. Becoming an EMT generally requires several months of training, whereas becoming a Paramedic requires more advanced training that can take two years to complete. While specific states or localities may have additional requirements, in general, according to the National Registry of Emergency Medical Technicians (NREMT)¹⁰, the education and training required to be an EMT includes:

- Successful completion of a state-approved Emergency Medical Technician (EMT) course that meets or exceeds the National Emergency Medical Services Education Standards for the Emergency Medical Technician.
- Candidates must have completed the course within the past two years and the course Program Director must verify successful course completion to the National Registry of EMTs.
 - Have a current CPR-BLS for "Healthcare Provider" or equivalent credential.
 - Successful completion of the National Registry EMT cognitive (knowledge) examination and a state-approved psychomotor (skills) examination.

⁷ <https://apps.usfa.fema.gov/registry/summary>

⁸ <https://www.nfpa.org/education-and-research/research/nfpa-research/fire-statistical-reports/fire-department-calls>

⁹ <https://www.bls.gov/ooh/protective-service/firefighters.htm#tab-4>

¹⁰ <https://www.nremt.org/EMT/Certification>

The education and training required to be a Paramedic includes¹¹:

- Current National Registry certification or state license at the EMT level, or higher.
- Successful completion of a Paramedic education program accredited by the Commission on Accreditation of Allied Health Education Programs (CAAHEP)¹² or an education program that has been issued a “Letter of Review” by the Committee on Accreditation for the EMS Professions (CoAEMSP)¹³ that meets or exceeds the National Emergency Medical Services Education Standards for Paramedic.
- Candidates must have completed the course within the past two years and the course Program Director must verify successful course completion to the National Registry of EMTs.
 - All Paramedic candidates who started their Paramedic education program after August 1, 2016, are required to complete a psychomotor competency portfolio.
 - Have a current CPR-BLS for “Healthcare Provider” or equivalent credential.
- Successful completion of the National Registry Paramedic computer-based examination.

Tools and Technologies

Firefighter/EMTs and Firefighter/Paramedics use the same tools and equipment in providing EMS that EMTs and Paramedics use.

The SOC occupation definition for Firefighters (33-2011) does not list specific tools and technologies. However, the SOC occupation definition for Paramedics (29-2043) lists EKGs as equipment used by the occupation. A Firefighter/Paramedic is also qualified to use an EKG and any other ALS-level equipment utilized by single-role paramedics.

Professional Trade Associations and Unions

Several professional trade associations and unions represent the proposed occupations. Some examples include the International Association of Fire Chiefs (IAFC)¹⁴; the International Association of Firefighters (IAFF)¹⁵; the National Volunteer Fire Council (NVFC)¹⁶; the National EMS Management Association (NEMSMA)¹⁷; and the National Association of Emergency Medical Technicians (NAEMT)¹⁸.

STEM Categories

We do not have any comments on the proposed STEM Categories.

¹¹ <https://www.nremt.org/Paramedic/Certification>

¹² <https://www.caahep.org/>

¹³ <https://coaemsp.org/>

¹⁴ <https://www.iafc.org>

¹⁵ <https://www.iaff.org/>

¹⁶ <https://www.nvfc.org/>

¹⁷ <https://www.nemsma.org>

¹⁸ <https://www.naemt.org>

Again, thank you for this opportunity to provide input for the 2028 SOC Policy revision process. Our organizations stand ready to assist the SOC Policy Committee in making the changes needed to obtain a more accurate picture of our nation's EMS workforce. Please feel free to contact us with any questions or if you need additional information.

Sincerely,

Academy of International Mobile Healthcare Integration (AIMHI)
American Ambulance Association (AAA)
American College of Emergency Physicians (ACEP)
Association of Air Medical Services (AAMS)
International Academies of Emergency Dispatch (IAED)
International Association of Emergency Medical Services Chiefs (IAEMSC)
International Association of Fire Chiefs (IAFC)
International Association of Firefighters (IAFF)
International Trauma Life Support
National Association of EMS Physicians (NAEMSP)
National Association of EMTs (NAEMT)
National Association of State EMS Officials (NASEMSO)
National EMS Management Association (NEMSMA)
National Registry of Emergency Medical Technicians (NREMT)