

# SAN FRANCISCO EMERGENCY MEDICAL SERVICES AGENCY

Policy Reference No.: 1000  
Effective Date: September 9, 2013  
Supersedes: January 1, 2011

## POLICY & PROTOCOL PUBLIC COMMENT PROCESS

### I. PURPOSE

To define the San Francisco Emergency Medical Services (EMS) Agency public comment and approval process for policies and patient treatment protocols.

### II. POLICY

- A. The EMS Agency is responsible for developing and updating policies and protocols for the administration and operations of the EMS system. By state statute, the EMS Agency Medical Director retains the final decision through his/her medical authority in matters pertaining to the planning, implementation and evaluation of the EMS system including all EMS policies and protocols. The EMS Agency shall follow the procedures outlined in this policy for public comment and approval of new or revised policies or patient treatment protocols. **For brevity, the term "policy" is used to mean either policy or protocol in this policy.**

### III. PUBLIC COMMENT PROCESS

- A. All new or significantly revised current policies are released via email and posted on the EMS Agency website for public review and comment prior to becoming effective. Written comments are due at the EMS Agency by the date listed on the public comment notice and webpage. The EMS Agency allows a minimum of 14 days for public comment.
- B. All comments received during the comment period will be reviewed by the EMS Agency Medical Director for either inclusion or exclusion in the policy. A summary of the comments received, their disposition and final policy drafts will be reviewed at the next EMS Advisory Committee meeting following the close of the public comment period.
- C. The EMS Advisory Committee shall vote on a recommendation to the Medical Director to accept or reject the draft version of the policies. The Medical Director may accept or reject the EMS Advisory Committee recommendation when determining the final policy content.
- D. The EMS Agency Medical Director shall forward the final policy to the Director of Health at the Department of Public - for his/her signature as the Chief Executive Officer of the Health Commission - the governing body for emergency medical services.

**IV. POLICY RELEASE WITHOUT PUBLIC COMMENT**

- A. The Medical Director reserves the right to make minor revisions to policies without public comment for administrative continuity of the EMS System. Minor revisions include grammatical, format editing, and /or minor corrections of outdated information.
- B. The Medical Director may immediately and without prior notice implement a new or significantly revised EMS Agency policy to protect public health and safety. Policies released under these circumstances shall be valid for 90 days from the initial effective date. Within 60 days of the initial effective date, the policy shall be released for the public comment following the procedures in Section IV. The Medical Director may extend a policy without public comment for one time for a total of 180 days from the initial effective date.

**V. POLICY EXEMPTION PROCESS**

- A. Requests for a policy exemption by an EMS provider must be submitted in writing to the EMS Medical Director. All requests must identify the reasons for the requested exemption and include substantive supporting documentation justifying the request.
- B. Upon request of the EMS Medical Director, the EMS Advisory Committee will review the exemption request at their next scheduled meeting to recommend either an approval or denial of the request.
- C. The Medical Director will review the exemption request, supporting documentation and recommendations in making a determination to approve or deny the request. The Medical Director will notify the submitting agency of a decision within 60 days of the date of the EMS Advisory Committee review. The decision of the Medical Director is final.

**VI. POLICY DISTRIBUTION**

- A. The EMS Agency is responsible for distribution of the final policy to EMS System stakeholders via email and EMS Agency website posting.
- B. All EMS system providers are responsible for:
  - 1. Distributing new or revised policies to employees prior to the implementation date and providing training on all relevant policies.
  - 2. Making available an EMS Agency Policy Manual to employees (either paper or electronic versions).

**VII. AUTHORITY**

California Health and Safety Code, Section 1797 et seq.  
California Code of Regulations, Title 22, Division 9  
San Francisco City Charter, Section 4.110  
San Francisco Health Code, Article 3, Section 112  
Health Commission Rules and Regulations, January 17, 2012

