



JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF CONSUMER & INDUSTRY SERVICES  
LANSING

DAVID C. HOLLISTER  
DIRECTOR

**TO:** Jan Christensen, Deputy Director  
Michigan Department of Community Health  
Tom Martin, Director, Policy and Legislative Affairs  
Michigan Department of Consumer & Industry Services

**FROM:** Gary N. Kelly, Chairperson  
Emergency Medical Services Coordinating Committee

**DATE:** October 8, 2003

**RE:** HB 4518

The EMSCC is concerned that HB 4518 bypasses current medical control authorities and conflicts with the intent of previous EMS legislation in Michigan. Methods for initiating protocols and determining minimum equipment, exist and are effective. Regarding the specific medical care discussed in the bill, there is already a state model protocol in place for use of the *EpiPen*®. The majority of medical control authorities have adopted this protocol. If there is a concern that the protocol is inadequate, there is a method for amending the required equipment list for EMS vehicles.

Our concern is that this bill sets a bad precedent. The state has affirmed in prior legislation that pre-hospital providers operate under their local medical control authority. To amend the law in this fashion takes away local control from the medical control authorities, and transfers it to the state legislature. The medical control authorities are composed of hospitals that accept and care for the patients transported by the local EMS system. The medical care authorities provide protocols, professional standards review and education. Michigan is a state that has reaffirmed local control for EMS on many occasions. Designating protocols in state legislation opens the door for bypassing local control of the care of patients in our communities. If the legislature intends to create state level medical control, new EMS legislation should be introduced. We welcome the opportunity to discuss this.

cc: Melanie Brim, Director  
Bureau of Health Services