

**EASTHAMPTON FIRE DEPARTMENT**

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**Christopher Norris**

**Fire Chief**

**August 1, 2023**

Department of Public Health

Commissioner Goldstein

250 Washington Street

Boston, MA 02108-4619

Commissioner Goldstein,

Thank you for allowing services to provide input on the proposed changed to 105 CMR 170.000, *Emergency Medical Services System.* On behalf of the Fire Chiefs Association of Massachusetts (FCAM), as the Chairperson of their EMS Committee, I would like to submit the following testimony.

The proposed changes to 105 CMR 170 as written pertaining to the administration of the COVID-19 and influenza vaccination requirements would pose a number of significant challenges to all emergency medical services across the Commonwealth. One of the biggest challenges would be the financial implications that would be levied on all services requiring those organizations to fund the cost of the vaccine administration as well as potentially incurring additional overtime costs or travel costs based on labor union contracts. Many of these labor union contracts have language requiring minimum hours of pay (ie. Upwards of 4 to 8 hours per person) for these types of activities if completed while off duty. Many of the local pharmacies that have partnered with emergency response organizations in the past do not have their own staffing to come on site to deliver these vaccines while personnel are on duty, requiring services to send personnel off-duty and incur overtime costs.

Volunteer and on-call emergency services organizations could also face severe financial impacts from these proposed changes by incurring the cost for the administration of these vaccines. Many of these organizations can have upwards of 30-50 on-call or volunteer members. Many of these organizations would not have the funding to annually provide these vaccinations. In addition, many of the Chiefs or Service Directors for these on-call and volunteer services have limited time administratively to add these increased reporting requirements.

The reporting and documentation of these vaccines adds further administrative burdens on all services for information the Department of Public Health already has access. As you are aware, since 2011, all providers who administer immunizations in Massachusetts are mandated to report immunizations data to the Massachusetts Immunization Information System (MIIS). The Department of Public Health promotes this statewide registry as a centralized database that provides complete, accurate, secure, and real-time immunization records for all residents, of all ages, in Massachusetts. Given the purpose and scope of this statewide database already in place, the documentation and reporting requirements of these proposed changes to the regulations would provide absolutely no additional value or information that isn’t already being made available to the Commonwealth.

Given these ramifications with no added value to the patients and organizations along with the increased financial burden placed on communities, many of which are already struggling with the economic challenges posed by other state mandates, the Fire Chiefs Association of Massachusetts adamantly opposes all of the proposed changes as written for 105 CMR 170.000, *Emergency Medical Services Systems.* We would be happy to discuss this further and we thank you again for allowing us the opportunity to provide this feedback on these proposed regulatory changes.

Sincerely,

***Christopher W. Norris, PhD***

***Fire Chief’s Association of Massachusetts***

***FCAM EMS Committee, Chairperson***

***Easthampton Fire Department***

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