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

**Subject: 2018 Standard Occupational Classification Revision Process Input**

Standard Occupational Classification Policy Committee Members:

The Joint National EMS Leadership Forum (JNEMSLF), an organization representing national organizations which support emergency medical services (EMS) across our nation, welcomes the opportunity to provide comment on the proposed revisions to the 2018 Standard Occupational Classification.

In 2014, 14 organizational members of the JNEMSLF sent a letter to the SOCPC presenting two primary concerns in the current structure used to collect EMS occupational data that resulted in critical EMS related workforce numbers being under reported. We note with great appreciation that the 2018 proposed revision has addressed one of these concerns by separating *Emergency Medical Technician* from *Paramedic* through the creation of separate classifications. This will dramatically improve the quality of the Bureau of Labor Statistics (BLS) data on these occupations and the many documents such as “The Occupational Outlook Handbook” which assists readers in determining a career.

We would greatly appreciate your consideration of the other primary concern which we raised, namely adding EMS credentialing to the work performed by firefighters. Many fire departments have firefighters who are also trained, and serve, as Emergency Medical Technicians (EMT) and Paramedics. It is our observation that fire departments may list these personnel solely as “Firefighters” due to the limited occupational categories currently available. These dual-role personnel serve as Paramedics and EMT’s on ambulances exactly the same as single-role Paramedics or EMT’s, as noted in 29-2040, in addition to performing fire suppression, technical rescue, and other response relevant to life safety. Dividing the general category of Firefighter into three sub-categories of “Firefighter-EMT,” “Firefighter-Paramedic,” and “Firefighter-All Other” would enhance the ability of the BLS to accurately determine the number and type of firefighters working in fire departments, and provide more accurate statistics on the number and type of workers who staff ambulance operations in our country.

Our organizations recommend the following changes to the SOCPC:

#### CURRENT

##### 33-2010 Firefighters

This broad occupation is the same as the detailed occupation:

##### 33-2011 Firefighters

33-2011 Firefighters Control and extinguish fires or respond to emergency situations where life, property, or the environment is at risk. Duties may include fire prevention, emergency medical service, hazardous material response, search and rescue, and disaster assistance.

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

#### PROPOSED

##### 33-2010 Firefighters

*This broad occupation includes the following three detailed occupations:*

##### *33-2011 Firefighter/ EMT*

##### *33-2012 Firefighter/ Paramedic*

##### *33-2013 Firefighters-All Other*

*33-2011 Firefighters / EMT: control and extinguish fires and respond to emergency situations and emergency medical situations where life, property, or the environment is at risk. Assess injuries and illnesses and administer basic emergency medical care, and extricate trapped individuals. Transport injured or sick persons to medical facilities onboard ambulances. Duties may include fire prevention, emergency medical service, hazardous material response, search and rescue, and disaster assistance. Excludes "Emergency Medical Services Practitioners, Except Firefighters"*

*Illustrative examples: Firefighter EMT*

*33-2012 Paramedic Firefighters: control and extinguish fires and respond to emergency situations and emergency medical situations where life, property, or the environment is at risk. Provide advanced emergency medical care and transportation. Paramedic Firefighters function under medical oversight. Perform interventions with the basic and advanced equipment typically found on an ambulance or fire apparatus. Must graduate from an accredited educational program for paramedics. Duties may include fire prevention, emergency medical service, hazardous material response, search and rescue, and disaster assistance. Excludes "Emergency Medical Services Practitioners, Except Firefighters."*

*Illustrative examples: Firefighter Paramedic, Fire Medic*

*33-2013 Firefighters-All Other: control and extinguish fires or respond to emergency situations and emergency medical situations where life, property, or the environment is at risk. Extricate trapped individuals and transport injured or sick persons to medical facilities onboard ambulances Duties may include fire prevention, emergency medical service at the first responder level, hazardous material response, search and rescue, and disaster assistance. Excludes "Emergency Medical Services Practitioners, Except Firefighter."*

Our organizations would welcome the opportunity to assist the SOCP to consider how these aspects of data collection can be clarified and enhanced to obtain a more accurate picture of our nation's EMS workforce. Please feel free to contact us with any questions about our comment or additional information.

Thank you very much for your consideration.

Sincerely,

National Association of Emergency Medical Technicians  
International Association of Firefighters  
National Association of State EMS Officials  
National Association of EMS Physicians  
American Red Cross  
American Ambulance Association  
International Association of Fire Chiefs  
National Volunteer Fire Council  
Association of Critical Care Transport  
National Association of EMS Educators  
National Registry of EMT's  
Association of Air Medical Services  
National EMS Management Association  
American College of Emergency Physicians  
International Academy of Emergency Dispatch  
Academy of International Mobile Healthcare Integration  
International Association of EMS Chiefs