



September 26, 2019

Nebraska Department of Health and Human Services  
Legal Services  
PO Box 95026  
Lincoln, NE  
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To Whom It May Concern:

The American College of Emergency Physicians (ACEP) and the Nebraska Chapter of ACEP appreciate the opportunity to provide comments on the proposed amendments to the Statewide Trauma System regulation (185 Nebraska Administrative Code 1-11). We are particularly concerned with two proposed requirements. The first is related to Advanced Trauma Life Support certification. According to the proposed amended 185 NAC 1, "physicians who specialize in emergency medicine, primary or family care, and advance practice providers providing care to trauma patients in the emergency department" must be ATLS certified "within one year of hire" for all three levels of trauma centers. Secondly, the proposed regulations related to trauma education would require emergency physicians to complete 32 hours of trauma continuing medical education every four years to work in Advanced Level Trauma Centers and 16 hours of trauma continuing education every four years to work in General and Basic Level Trauma Centers.

We respectfully request that the Department of Health and Human Services (Department) exempt board-certified emergency physicians from these requirements. ACEP policy states that courses including Advanced Trauma Life Support (ATLS) are unnecessary for emergency physicians certified by the American Board of Emergency Medicine or the American Osteopathic Board of Emergency Medicine. Board certification in emergency medicine demonstrates comprehensive training, knowledge and skill in the practice of emergency medicine sub-areas such as trauma. Education through short courses like ATLS are thoroughly covered as part of the core curriculum of emergency medicine. Additionally, maintenance of board certification requires mandatory retesting and continuing medical education (CME) that makes courses like ATLS, and requirements for a specified number of CME hours, redundant and unduly burdensome.

The American College of Surgeons (ACS), which the Department has designated as the verifying body for trauma centers in the state, recognizes the sufficiency of trauma training that board-certified emergency physicians receive. In its

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“Resources for Optimal Care of the Injured Patient”, ACS addresses the ATLS status of emergency physicians, stating that “In Level I, II, and III trauma centers, all board-certified emergency physicians or those eligible for certification by an appropriate emergency medicine board according to their current requirements must have successfully completed the ATLS course at least once (CD 7–14).” The vast majority of board-certified emergency physicians complete ATLS in residency. The Department’s proposed requirement that board-certified emergency physicians take the course again “within one year of hire” is wholly unnecessary and since maintenance of certification activities entail ongoing trauma education, any additional CME requirements of board-certified emergency physicians are equally unwarranted.

For ABEM or AOBEM-certified physicians, we strongly oppose requiring completion of courses such as ATLS or a specified number of CME hours and we request that the proposed Statewide Trauma System regulations be further revised to remove these requirements for board-certified emergency physicians.

Thank you for your consideration of our input on this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Vidor E. Friedman". The signature is fluid and cursive, with a large loop at the end.

Vidor E. Friedman, MD, FACEP  
President, American College of Emergency Physicians

A handwritten signature in black ink, appearing to read "Renee Engler MD, FACEP". The signature is cursive and somewhat stylized.

Renee Engler, MD, FACEP  
President, Nebraska Chapter, ACEP