



May 27, 2020

The Honorable Peter Gaynor  
Administrator  
Federal Emergency Management Agency  
500 C Street, SW  
Washington, D.C. 20024

Dear Administrator Gaynor:

On behalf of the International Association of Fire Chiefs, the National Association of Emergency Medical Technicians, and the REV Group, we write to request that the Federal Emergency Management Agency (FEMA) amend the Authorized Equipment List (AEL) for FEMA's preparedness grants to also include ambulances. Ambulances play a vital role in facilitating the rapid treatment and transportation of patients injured in a terrorist attack or natural disaster. Additionally, single-patient ambulances also provide an important mechanism to treat and transport patients suffering from highly-communicable illnesses, such as the SARS-CoV-2 virus, without exposing them to other uninfected patients. Given this versatile role, our organizations urge FEMA to add traditionally defined ambulances to the AEL as a means of assisting local jurisdictions in enhancing their emergency response preparedness and readiness.

Improving and expanding EMS readiness at the local level is key to ensuring local governments are prepared for the myriad emergencies to which they may be forced to respond. FEMA's *Community Lifelines Implementation Toolkit* accordingly identifies EMS and efficient patient movement as being a key component to the essential "Health and Medical" community lifeline during a disaster.<sup>1</sup> The exclusion of ambulances from FEMA's AEL presents a challenge to local jurisdictions seeking to enhance their ability to provide EMS-response. Whether an agency is seeking to improve their EMS response capacity for active shooter incidents, explosive or chemical attacks, or even natural disasters and pandemics, it is critical that fire departments and EMS agencies be able to quickly and efficiently treat and transport patients. Adding traditionally defined ambulances to the AEL will undoubtedly assist FEMA in its mission to build and support local response capabilities.

Our organizations propose that FEMA adopts the definition of "ambulances" as established in either the General Services Administrations (GSA)'s [KKK-A-1822F](#) specification or the *NFPA 1917: Standard on Automotive Ambulances* (NFPA 1917), which has been accredited by the American

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<sup>1</sup> *Community Lifelines Implementation Toolkit*. Federal Emergency Management Agency. November 2019. Page 12. <https://www.fema.gov/media-library-data/1576770152678-87196e4c3d091f0319da967cf47ffd9c/CommunityLifelinesToolkit2.0v2.pdf>

National Standards Institute. In adopting either the NFPA 1917 or GSA’s definitions of “ambulances,” FEMA will be able to build EMS readiness and provide greater flexibility to local communities to address emerging threats from terrorist threats or natural disasters. Additionally, adhering to this definition of “ambulance” will ensure FEMA maintains consistency with other federal agencies and local and state governments which also utilize the KKK-A-1822F specification or the NFPA 1917 standard for ground ambulances.

As you know, FEMA maintains the AEL in an effort to identify the equipment that would be necessary to respond to terrorist attacks or other natural disasters. However, the U.S. Department of Homeland Security (DHS) has acknowledged that equipment necessary to respond to terrorist attacks or natural disasters also can serve more than one purpose and may simultaneously support preparedness for other hazards and routine emergencies.<sup>2</sup> Traditional ambulances, as defined by the KKK-A-1822F specification and NFPA 1917 standard, are an example of such equipment that can be used to care for victims of a natural disaster or terrorist incident as well as routine EMS patients. Our organizations believe that when a jurisdiction prepares for any one of these eventualities, it prepares for them all.

Ultimately, jurisdictions need the flexibility to bolster their emergency response capabilities and use funds to purchase equipment that addresses all of the EMS response needs associated with disasters, pandemics, and other national emergencies. Allowing local jurisdictions to invest in multifaceted resources, such as ambulances defined in the KKK-A-1822F specification or the NFPA 1917 standard, would be an effective and financially prudent way to prepare jurisdictions to respond to and mitigate a variety of emergencies.

Our organizations appreciate FEMA’s attention to this issue. We look forward to continuing to work with FEMA to ensure that local jurisdictions are properly equipped and prepared to protect their communities from a wide array of natural, man-made, and biological emergencies.

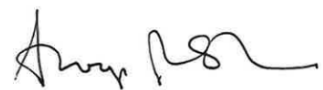
Sincerely,



Matt Zavadsky, MS-HSA, NREMT  
President, NAEMT



Fire Chief Gary Ludwig  
President and Chairman of the Board  
International Association of Fire Chiefs



Anoop Prakash  
President, Ambulance  
REV Group

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<sup>2</sup>Notice of Funding Opportunity – Homeland Security Grant Program. [https://www.fema.gov/media-library-data/1583442273016-07cbcf9445f9fda3cdc5bf8439ec72c9/FY\\_2020\\_HSGP\\_NOFO\\_FINAL\\_508ML4.pdf](https://www.fema.gov/media-library-data/1583442273016-07cbcf9445f9fda3cdc5bf8439ec72c9/FY_2020_HSGP_NOFO_FINAL_508ML4.pdf)