



September 14, 2011

Carol Rawson, P.E.  
Director, Traffic Operations Division  
Texas Department of Transportation  
125 East 11<sup>th</sup> St.  
Austin, Texas 78701-2483

Dear Ms. Rawson:

On behalf of the Texas EMS, Trauma & Acute Care Foundation we appreciate the opportunity to comment on the Texas Department of Transportation proposed changes to the *Texas Manual on Uniform Traffic Control Devices* dated July 15, 2011.

As was shared through oral testimony at the August 29, 2011, Texas Department of Transportation hearing on the proposed manual clear signage of hospitals, EMS and free standing emergency medical care facilities is important to provide better, more informed patient care for those in need of emergency or trauma services. While many different entities work together for the benefit of all Texans in an emergent situation there are also many distinct parts to the trauma and emergency health care system in Texas. There are unique differences between hospitals, hospitals designated as trauma facilities, EMS, and free standing emergency medical care facilities. Any signage should clearly mark these distinctions for public safety.

TETAF believes clarification of which facilities are eligible to post the "blue H" sign (General Service Sign D9-2) is an important step. Notifying the public where all general hospitals licensed under chapter 241 of the Texas Health and Safety Code are located will improve patient care. General hospitals must meet basic guidelines to be open to the general public, maintain operations 24 hours, seven days a week, and have a doctor available at all times or on-call and who can reach the emergency department or emergency care facility within 30 minutes ensure better outcomes for any patient. Only those facilities licensed under Chapter 241 should be able to use the "blue H".

Additional descriptors to emergency and trauma care signs are contemplated in Sections 21.02 (16) and pairing of signs in Section 21.02 (17), however while use of some of these signs will lead to better information to the public other signs may prove to be misleading or confusing.

While not contemplated in the proposed manual, pairing the "blue H" with the "Trauma Center" sign (General Service Sign D9-13d) would be a significant distinction. Designated Trauma Facilities in Texas meet an extra set of requirements beyond their hospital license and are certified to meet them by the Texas Department of State Health Services. Trauma facilities are better equipped to handle the most life-threatening situations daily. While trauma facilities are designated as comprehensive, major, advanced and basic (levels one through four) all participate in the Texas Trauma System that is focused on treating patients at the most appropriate level in the timeliest fashion. There is a keen eye at a trauma facility in treating within the "golden hour", the period immediately after a life-threatening injury in which the likelihood of survival is greatest with treatment.

The proposed manual proposes using the EMS “Star of Life” emblem (General Service Sign D9-13). The “Star of Life” has become synonymous with emergency medical care. This symbol can be seen as a means of identification on ambulances, emergency medical equipment, patches or apparel worn by EMS providers and materials. The emblem created by the National Highway Traffic Safety Administration (NHTSA) has generally been used to refer to emergency personnel such as paramedics. Using this emblem with the “blue H” or other signs such as “trauma center” would diminish the use of these symbols on their own.

One matter unresolved and not contemplated with the proposed rules is possible signage directing the general public to free standing emergency medical care facilities licensed under Chapter 254 of the Texas Health and Safety Code. These facilities are open 24/7 and provide emergency services to many Texans. It would not be appropriate for these facilities to be indicated with the “blue H” as they are not hospitals. However, indicating the location of these facilities with the “Emergency Medical Care” (General Service Sign D9-13cP) would be most appropriate.

Use of official signs on Texas roadways is an important public safety role for the Texas Department of Transportation. Clearly indicating which health facilities and capabilities of these facilities are available to the public will help to save lives. TETAF appreciates the opportunity to comment on the proposed changes to the *Texas Manual on Uniform Traffic Control Devices* and welcomes any further dialogue to determine the best course to improving public safety.

Sincerely,



Dinah S. Welsh

Chief Executive Officer