



October 27, 2023

To:
Sam Hurley, MPH, Director Maine EMS
Amy Drinkwater, Chair, Maine EMS

Re: Waiver Request Chapter 22 Emergency Services Data Rules.

LifeFlight of Maine was issued a one-year waiver of the data rule in chapter 22 last January. As part of the waiver request, LifeFlight of Maine would continue to use emsCharts as the primary platform for data entry of all LifeFlight of Maine patient transports. A data exchange has been developed and utilized between emsCharts and Image Trend (MEMFIRS). LifeFlight of Maine has worked with MEMS, Image Trend and emsCharts to facilitate this data exchange, which creates a patient care record in MEMFIRS. For LifeFlight to meet the data standards, it required our clinicians to complete the chart in emsCharts then log into MEFIRS to fix any validation errors due to non-available data points or data points that could not be mapped.

Despite many hours spent by LifeFlight of Maine's data team, MEMS data team and emsCharts data team, we have not been able to meet the standard set by chapter 22 without dual charting in both emsCharts and MEMFIRS. LifeFlight of Maine has made the decision to transition to MEFIRS.

Our team is working with the MEMS data team to develop a critical care record that meets both LifeFlight of Maine and MEMS needs. LifeFlight of Maine's goal is to transition to direct entry into MEFIRS by January 1, 2024. As with any project of this magnitude, issues may arise that may delay that implementation date. As our waiver will end in the beginning of January, LifeFlight of Maine is requesting our current waiver be extended for 30 days with an additional 30 days to be approved by the office if needed.

1. Whether the person or organization seeking the waiver took reasonable steps to ascertain the rule and comply with it;

Response: Yes, LifeFlight of Maine has worked to develop our current system (emsCharts) to exchange data to MEFIRS. We have made the decision to move to MEFIRS for the reasons stated above. Our team has been working for last six weeks to ensure we are ready to transition on January 1, 2024.

2. Whether the person or organization seeking the waiver was given inaccurate information by an agent or employee of the State EMS program;

Response:
Not Applicable.

3. Whether the person or organization seeking the waiver, or any other individual or group, would be significantly injured or harmed if the rule were not waived;

Response: Yes, if the waiver is not approved for extension, LifeFlight of Maine could be held in violation of chapter 22 while we complete the transition from emsCharts to MEFIRS.

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4. Whether waiver of the rule in the particular case would pose a health or safety risk to the public at large or a particular individual or community; and

Response:

There is no health or safety risk to the public or any individual in the community if this data Rule is waived for LifeFlight as every patient care record is entered into MEFIRS and our clinicians log into MEFIRS to ensure all records meet the MEMS data standard.

5. Whether waiver of the rule in the particular case would establish a precedent that would unduly hinder the Board or office of EMS in its administration of Maine's EMS system.

Response: No, the extension of the current waiver is only to allow LifeFlight of Maine to fully comply with chapter 22.

Based on the conditions to issue a waiver, we strongly believe LifeFlight meets the case and respectfully request the Board to issue the waiver as LifeFlight of Maine will make a full transition to MEFIRS and will continue to enter each patient care record into MEFIRS via data exchange with emsCharts with an extra step for our crews to assure improved validation.

Thank you for considering this waiver.

Sincerely,

William J. Cyr

William Cyr
COO

Cc:

Joe Kellner

Mike Choate

Norm Dinerman, MD

Pete Tilney, DO

David Saquet, MD

