

September 13, 2011



TEXAS HOSPITAL ASSOCIATION

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

Dear Ms. Rawson:

On behalf of the Texas Hospital Association and its more than 500 member hospitals, I thank you for the opportunity to comment on the Texas Department of Transportation's July 15, 2011, proposed changes to the *Manual on Uniform Traffic Control Devices*.

THA appreciates TxDOT's response to concerns that were raised last fall regarding which facilities were eligible to receive a "blue H" sign (General Service Sign D9-2). Previous interpretation of TxDOT's 2009 Guidelines for Hospital Signing gave the impression that only certain designated trauma facilities could receive the "blue H" sign on a highway, despite the fact that additional facilities met the guidelines' requirements of being open to the general public, maintaining operations 24 hours every day of the year, and having a doctor available at all times or on-call and can reach the emergency department or emergency care facility within 30 minutes. Changes in Section 21.03(04) clarify that all general hospitals licensed under Chapter 241 of the Texas Health and Safety Code will receive a "blue H." THA supports this change in that it will address confusion previously raised about which facilities could receive the "blue H" sign, as well as provide the public direction to a greater number of qualified facilities that can care for them in an emergency or life-threatening situation.

However, hospitals believe broadening the criteria of who can receive a "blue H" on the highway raises some other issues. Specifically, THA believes that some of the assignment of signs in Section 21.02 (16) and pairing of signs in Section 21.02 (17) could be clearer and provide more appropriate direction to the public. Listed below are the changes THA recommends:

1) Add a pairing in Section 21.02(17) of the "blue H" (D9-2) and "Trauma Center" signs (D9-13dP).

Under the new proposed manual Section 21.03(04), all licensed general hospitals will receive a "blue H" sign. However, pairing the blue H with the Trauma Center sign (General Service Sign D9-13d) is not contemplated in the proposed changes to the manual. As a practical matter, designated trauma facilities have specific capabilities that non-designated hospitals do not have. Designated trauma facilities routinely handle life-threatening situations, and are staffed and equipped to respond to a broad range of injury and illness crises. Each level of designation requires specific staffing, training and response capabilities, which set these hospitals apart from non-designated facilities. In life-threatening situations where time is crucial, it is vitally important that individuals get care as quickly as possible and in the right setting. While THA supports alerting the public to the proximity of a licensed general hospital, it is also important to make the distinction if a hospital is a designated trauma facility.

2) **Delete the “Emergency Medical Services” symbol (D9-13) proposed in Section 21.02(16).**

The Emergency Medical Services (EMS) symbol is denoted by the “star of life,” which traditionally represents paramedics, ambulances or other EMS personnel. However, using this symbol on a freeway in addition to the “blue H” or other signs such as “trauma center” and “emergency medical care” seems redundant. All hospitals and freestanding emergency centers are capable of treating, stabilizing and, if necessary, transferring a patient. They also have access to paramedics and EMS. In general, an ambulance will be dispatched to pick up an individual rather than an individual seeking an ambulance or EMS provider, which THA believes justifies doing away with the “ambulance station” sign (D9-13bP). Similarly, the EMS symbol may not be as helpful on a freeway as a simple “blue H” or “emergency medical care” sign. THA supports directing the public to facilities where emergency medical care is available, and believes the appropriate signage for hospitals should be the “blue H” with a possible pairing of “trauma center” when applicable, and “emergency medical care” for freestanding emergency centers (FECs) that are open 24 hours a day, seven days a week. THA recommends eliminating the emergency medical services symbol sign.

Notifying the public where emergency medical services are located through signs on Texas freeways and roads is an extremely important role for TxDOT. The Texas trauma system and other facilities providing emergency medical care are well prepared to care for individuals in emergency situations, and the public should be aware of these facilities’ locations at all times. Signage is especially important when an individual is in an unfamiliar location. THA wants to ensure that signage denoting these different types of facilities is not confusing so that in emergency situations, individuals get to the appropriate location in the shortest amount of time possible.

Thank you again for the opportunity to comment on the proposed changes to the *Manual on Uniform Traffic Control Devices*.

Sincerely,

A handwritten signature in black ink, appearing to read 'Denise Rose', followed by a long horizontal line extending to the right.

Denise Rose, J.D.
Senior Director,
Advocacy and Public Policy