

December 20 2018

Alberta College of Paramedics
#220, 2755 Broadmoor Boulevard
Sherwood Park, Alberta T8H 2W7

Re: Extended Hours and Core-Flex Staffing Model

Attention: The Alberta College of Paramedics Council

Thank you for your prompt response to the Alberta Paramedic Association (Association) letter, identifying the existence of an immediate dangerous threat to public health, which was discovered in the Association's ongoing study of professional fatigue and the health effects of working extended hours.

On November 28 2018, the Association officially informed the Alberta College of Paramedics (College) that paramedics who are providing emergency health services for extended period of time, typically 72 to 96 hours in duration, are increasingly at risk of providing professional services while in an impaired state of fatigue. Furthermore, the Association outlined concerns with the following: ineffective fatigue management policies, resulting in paramedics reporting excessive fatigue and micro sleeps while providing patient care or operating emergency vehicles; paramedics performing critical task such as patient care while in an impaired state of sleep inertia; and disturbances in cognitive functioning that are extensively linked to sleep disturbances such as sleep deprivation and sleep fragmentation, which will consequently impact both the effectiveness of paramedics and public safety.

In response to the Association's call to action, the College suggested this is a matter of employment contract issues and not the jurisdiction of a professional regulator (College) who is mandated under *The Health Professions Act (HPA)*. Whereas, *section 3(1)* of the *HPA* clearly defines the role of a College:

“A college

- (a) must carry out its activities and govern its regulated members in a manner that protects and serves the public interest,*
- (b) must provide direction to and regulate the practice of the regulated profession by its regulated members,*
- (c) must establish, maintain and enforce standards for registration and of continuing competence and standards of practice of the regulated profession.”*

Therefore, under section 3(1) of the *HPA*, the College is obligated to regulate any unsafe professional practice, including hours of work. Other Colleges such as CARNA have taken steps to protect the public as outlined in their: *Working Extra Hours: Guidelines for Regulated Members on Fitness to Practise and the Provision of Safe, Competent, Ethical Nursing Care*. The Association is requesting the College to fulfill its obligation as the regulator by implementing standards of practice that eliminates the current public health threat created by extended hours of work. Without appropriate regulation, paramedicine will unfortunately experience a fatigue driven tragedy. Who will be accountable then? Don't wait for a fatality to happen. We need to take steps to prevent a fatigue related accident and injury now.

We look forward to your action,



Dusty Myshrall, ACP
President

Alberta Paramedic Association



CC The Hon. Sarah Hoffman, Deputy Premier, Minister of Health
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