

**DEPARTMENT OF HEALTH SERVICES
BUREAU OF EMERGENCY MEDICAL SERVICES**

**SUBSTANTIVE POLICY STATEMENT
#SP-095-PHS-EMS**

**Clarification of
Arizona Administrative Code (A.A.C.) Title 9, Chapter 25, Article 13 Trauma Center Designation**

This substantive policy statement is advisory only. A substantive policy statement does not include internal procedural documents that only affect the internal procedures of the agency and does not impose additional requirements or penalties on regulated parties or include confidential information or rules made in accordance with the Arizona Administrative Procedure Act. If you believe that this substantive policy statement does impose additional requirements or penalties on regulated parties, you may petition the agency under Arizona Revised Statutes § 41-1033 for a review of the statement.

The purpose of this substantive policy statement is to provide the public with clarification of the Arizona Department of Health Services' (Department) policy regarding the designation of trauma centers.

Arizona Revised Statutes (A.R.S.) § 36-2225(A)(4)(a) specifies that the Department may adopt rules for designation and de-designation of trauma centers based on:

- (i) A health care institution's verification as a trauma facility by a national verification organization.
- (ii) A determination by a national verification organization that a health care institution meets the state standards established by rule for designation as a trauma center.
- (iii) A determination by the department that a health care institution meets the state standards established by rule for designation as a trauma center.

When the Department adopted rules for designation and de-designation of trauma centers in 9 A.A.C. 25, Article 13, the rules specifying eligibility for designation as a Level I, Level II, Level III, or Level IV trauma center were made in A.A.C. R9-25-1302(A). The rules for designation as a Level I, II, or III trauma center allow a health care institution to hold either current verification as a trauma facility at the applicable level issued by the American College of Surgeons Committee on Trauma (ACS) (allowed under A.R.S. § 36-2225(A)(4)(a)(i)) or current documentation issued by ACS stating that the health care institution meets the state standards for the applicable level of trauma center (allowed under A.R.S. § 36-2225(A)(4)(a)(ii)). The rules for designation as a Level IV trauma center allow a health care institution either to hold current verification as a Level IV trauma facility issued by ACS (allowed under A.R.S. § 36-2225(A)(4)(a)(i)) or to demonstrate during an on-site survey by the Department that the health care institution meets the state standards for a Level IV trauma center (allowed under A.R.S. § 36-2225(A)(4)(a)(iii)).

Recently, ACS has informed the Department that ACS may no longer issue documentation to a health care institution stating that the health care institution meets the state standards for the applicable level of trauma center. Until the rules in A.A.C. R9-25-1302(A) are amended, this decision may leave a health care institution that wants to be designated as a Level I, Level II, or Level III trauma center with only one method by which to obtain designation and may cause a health care institution to receive a designation at a lower level of trauma center than previous designations. For example, a healthcare institution that was previously designated as a State Level I trauma center might now only be verified as an ACS Level II trauma center, which could have a significant fiscal impact on the health care institution. To comply with

A.R.S. § 36-2225(A)(4)(a) and allow these health care institutions more than one method by which to obtain designation, the Department will participate in an on-site survey, in conjunction with ACS, for applicants for designation as a Level I, Level II, or Level III trauma center. If ACS does not issue verification as a trauma facility at the applicable level to the health care institution, the Department will determine whether the health care institution meets state standards for the applicable level of trauma facility, based on observations during the on-site survey and a review of the ACS report to the health care institution, and designate health care institutions meeting state standards as trauma centers.

*Effective December 1, 2014
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