

Pulsara Implementation Guidelines for the Air Medical Provider

Background

Pulsara is being promoted as the standard for pre-hospital patient notification and communication statewide. While this is a little more straightforward for ground EMS operations, many questions routinely come up with regards to how Air providers would utilize Pulsara and what is allowed due to regulatory guidance. The following excerpts are meant to provide a starting point for agencies wishing to navigate how they would utilize Pulsara. Like HIPAA, great variance in interpretation exists depending on the person reading the guidance. For this reason, Pulsara does not recommend a hard and fast ruling and instead offers opportunities to utilize Pulsara whether an air operation is taking a less or more risk averse approach to utilizing Pulsara.

CAMTS Guidance on Mobile Devices

<https://www.camts.org/wp-content/uploads/2023/10/Special-Operations-2023-Standards-Final.pdf>

04.02.04 If cellular phones are part of the on-board communications equipment, they are to be used in accordance with FCC regulations. (See References) (RW/FW)

1. For aircraft, cellular phones must be shut off or placed in airplane mode whenever required by the AHJ and the notice according to FCC or other AHJ regulations must be posted in the aircraft. (RW/FW)

2. A policy prohibits the use of cellular phones or other communications devices without an acceptable, integrated hands-free system while the vehicle is in motion or while refueling
COMMUNICATIONS Commission on Accreditation of Medical Transport Systems camts.org
2023 Special Operations – Medical Retrieval Accreditation Standards 4.2 ***Except for vital communications or as compliant with state or national regulations.*** Texting is strictly prohibited. (RW/FW/S)

3. Surface providers whose medical director(s) has established the requirement for transmission of biomedical telemetry may utilize the cellular telephone system for such communications.

4. A required policy on portable electronic devices that allows for their use only for safety related activities, such as flight/transport planning, refueling, transport vehicle inspections, or clinical use, while the vehicle is in motion.

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FAA

<https://www.ecfr.gov/current/title-14/chapter-I/subchapter-G/part-135/subpart-C/section-135.144>

§ 135.144 Portable electronic devices.

(a) Except as provided in [paragraph \(b\)](#) of this section, no [person](#) may operate, nor may any operator or [pilot in command](#) of an [aircraft](#) allow the operation of, any portable electronic device on any U.S.-registered [civil aircraft](#) operating under this part.

(b) [Paragraph \(a\)](#) of this section does not apply to—

(1) Portable voice recorders;

(2) Hearing aids;

(3) Heart pacemakers;

(4) Electric shavers;

(5) [Portable oxygen concentrators](#) that comply with the requirements in [§ 135.91](#); or

(6) **Any other portable electronic device that the part 119 certificate holder has determined will not cause interference with the navigation or communication system of the [aircraft](#) on which it is to be used.**

Additionally, the FAA strongly recommends that transport aircraft are equipped with 5g compatible radar altimeters and, if compliant, this equipment significantly enhances the air services ability to meet 135.144 (b) 6



Less	Pulsara use by Flight Crews	More
☒	Scan Band at patients side	☒
☒	Create patient channel onscene	☒
☒	Med Control on the ground	☒
☒	Send notification prior to liftoff	☒
☒	Communication with ground ems	☐
☒	Communicate with hospital in flight	☐
☐	Allow flight following / dispatch to relay info via radio	☒
☐	Allow ground ems to send notification on behalf of Flight	☒
☒	Provide feedback and promote follow up communication after patient delivery	☒

The above diagram outlines how flight crews can utilize Pulsara in a variety of ways to accomplish interoperability and continuity of care with referral sources (hospitals and ground EMS) and receiving facilities, regardless of their risk aversion and local policy stance on mobile device use in flight.

There is a significant amount of functionality that can be consumed without using a mobile device in flight, while services who have determined they are safe to utilize in flight would simply enjoy more functionality.

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Steps for implementation

1. Sign up for Pulsara (It's Free to sign up) <https://www.pulsara.com/texas-resources>
 - a. Click Join the network
2. Review above background and guidance and determine level of risk acceptance to drive operational and clinical scope of use
3. Amend current policies and procedures if needed to align with adopted technology standards
4. Air Medical programs must comply with any specific requirements pertaining to the use of mobile communication or cellular devices in accordance with the aviation operator's (Part 135 Aviation Certificate Holder) General Operations Manual (GOM).
5. Leverage training videos and downloadable materials found at www.pulsara.com/academy
6. The Pulsara team is available for consultation to help with set up or to talk through the best adoption based on specific regional or operational concerns. help@pulsara.com