



Steve McCoy, Bureau Chief
Bureau of Emergency Medical Oversight
Florida Department of Health
4052 Bald Cypress Way
Tallahassee, Florida 32399

June 25, 2024

Steve McCoy:

We are concerned about the language in the proposed rule 64J-2.018 Do Not Resuscitate Order (DNRO) Form. Specifically, the **requirement** contained within 64J-2.018 (7) for an EMT or paramedic to verify the patient's identity by reviewing the patient's driver's license or other photo identification.

Few people with DNROs have a driver's license or other photo identification or have them readily available. The overwhelming majority of patients with a DNRO are of significant age and have a terminal illness. These patients have often stopped driving long before a DNRO was executed and, in most cases, have no driver's license or photo ID. Moreover, during the immediate moments upon the arrival of the EMS providers, a split-second decision has to be made to initiate care or to honor the DNRO presented.

For over twenty years, our EMTs and paramedics have verified the patient's identity using a photo ID or **"from a witness in the presence of the patient."** This practice is contained within the existing rules, has been effective, and is deeply ingrained in our procedures.

EMTs and paramedics have a moral and ethical obligation to respect patients' and their families' autonomy and self-determination decisions regarding end-of-life care.

The proposed language would force our EMTs and paramedics to provide resuscitative care against the wishes of our patients or their families and the orders of their physicians, thus nullifying the purpose of the rule itself, which is to allow EMTs and paramedics to respect a patient's and their family's autonomy and self-determination decisions regarding end-of-life care.

We respectfully request that the language be modified to include the ability to verify the patient's identity using either a photo ID or **"from a witness in the presence of the patient."**

Sincerely,

A handwritten signature in black ink that reads "Darrel Donatto".

Darrel Donatto, Fire Chief
Town of Jupiter Fire Rescue
Government Relations Chair, Florida Fire Chiefs Association