

## Rule Summary and Fiscal Analysis

### Part A - General Questions

**Rule Number:** 4765-4-03

**Rule Type:** No Change

**Rule Title/Tagline:** Required reporting.

**Agency Name:** State Board of Emergency Medical, Fire, and Transportation Services

**Division:**

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#### I. Rule Summary

1. **Is this a five year rule review?** Yes
  - A. **What is the rule's five year review date?** 1/9/2018 and 11/01/2022

2. **Is this rule the result of recent legislation?** No
3. **What statute is this rule being promulgated under?** 119.03
4. **What statute(s) grant rule writing authority?** 4765.06, 4765.11
5. **What statute(s) does the rule implement or amplify?** 4765.06
6. **What are the reasons for proposing the rule?**

This rule is being filed according to a R.C. 106.03 periodic rule review.

7. **Summarize the rule's content, and if this is an amended rule, also summarize the rule's changes.**

This rule identifies which entities are required by section 4765.06 of the Revised Code to report clinical data and sets the minimum information to be collected from each entity.

8. **Does the rule incorporate material by reference?** No

9. **If the rule incorporates material by reference and the agency claims the material is exempt pursuant to R.C. 121.71 to 121.76, please explain the basis for the exemption and how an individual can find the referenced material.**

*Not Applicable*

10. **If revising or re-filing the rule, please indicate the changes made in the revised or re-filed version of the rule.**

*Not Applicable*

## **II. Fiscal Analysis**

11. **As a result of this proposed rule, please estimate the increase / decrease in revenues or expenditures affecting this agency, or the state generally, in the current biennium or future years. If the proposed rule is likely to have a different fiscal effect in future years, please describe the expected difference and operation.**

This will have no impact on revenues or expenditures.

0.00

Not applicable.

12. **What are the estimated costs of compliance for all persons and/or organizations directly affected by the rule?**

The estimated costs of compliance for stakeholders include basic internet access (to submit the required information) and a small amount of time for data entry. While no sources exist to verify, it can be safely assumed that internet access is universally available throughout Ohio and is a cost already being borne by affected stakeholders for other purposes, including and especially for medical billing. Cost for data entry time will vary widely as both hospitals, using paid medical records staff, and volunteer EMS agencies, using unpaid staff, will spend between 10 and 20 minutes per record. The number of records submitted will also vary, dependent on the submitting entity's size and its patient volume. There is no cost to collecting the data as it is already collected as a matter of routine clinical record-keeping practice.

13. **Does the rule increase local government costs? (If yes, you must complete an RSFA Part B). Yes**

14. Does the rule regulate environmental protection? (If yes, you must complete an RSFA Part C). No

**III. Common Sense Initiative (CSI) Questions**

15. Was this rule filed with the Common Sense Initiative Office? Yes

16. Does this rule have an adverse impact on business? Yes

- A. Does this rule require a license, permit, or any other prior authorization to engage in or operate a line of business? No
- B. Does this rule impose a criminal penalty, a civil penalty, or another sanction, or create a cause of action, for failure to comply with its terms? No
- C. Does this rule require specific expenditures or the report of information as a condition of compliance? Yes

R.C. 4765.06 creates clinical data systems for research and system monitoring. This rule details which entities are required to submit information to those systems and what data is to be submitted.

## Rule Summary and Fiscal Analysis

### Part B - Local Governments Questions

**1. Does the rule increase costs for:**

<b>A. Public School Districts</b>	No
<b>B. County Government</b>	Yes
<b>C. Township Government</b>	Yes
<b>D. City and Village Governments</b>	Yes

**2. Please estimate the total cost, in dollars, of compliance with the rule for the affected local government(s). If you cannot give a dollar cost, explain how the local government is financially impacted.**

The fiscal impact of this rule on the approximately 1,400 emergency medical service agencies operated by counties, townships and municipal corporations in Ohio is impossible to determine as no valid cost data on performing data entry exist.

Cost of compliance will vary considerably across the state, dependent upon the pay structure of the individual department. There is a wide variance in pay structures among EMS agencies, from paid departments to paid-per-call departments to volunteer departments.

Additionally, the majority of EMS agencies (estimated >80%) bill for their services and some billing companies provide data submission services gratis to their client EMS agencies. There is no estimate on the number of such arrangements.

**3. Is this rule the result of a federal government requirement? No**

**A. If yes, does this rule do more than the federal government requires? *Not Applicable***

**B. If yes, what are the costs, in dollars, to the local government for the regulation that exceeds the federal government requirement?**

*Not Applicable*

**4. Please provide an estimated cost of compliance for the proposed rule if it has an impact on the following:**

**A. Personnel Costs**

There will be no increases in the number of EMS personnel as a result of this rule.

**B. New Equipment or Other Capital Costs**

There is no additional equipment or other capital outlay required by this rule.

**C. Operating Costs**

The data collected by the clinical data systems is a subset of data already collected by EMS agencies. The only operating cost that may be incurred would be for time to submit the data. As noted in #2, these costs cannot be estimated.

**D. Any Indirect Central Service Costs**

There are no anticipated increases in these costs.

**E. Other Costs**

There are no anticipated increases in these costs.

**5. Please explain how the local government(s) will be able to pay for the increased costs associated with the rule.**

While there are no new requirements imposed by this "no change" rule, EMS agencies are eligible to receive grants from the State Board of Emergency Medical, Fire, and Transportation Services' EMS/Trauma Grant program. This would offset (in most cases, completely) any computer hardware or software upgrade/replacement costs incurred to maintain compliance with the rule.

**6. What will be the impact on economic development, if any, as the result of this rule?**

This rule will not have any direct impact on economic development.