

Rule Summary and Fiscal Analysis (Part A)**State Board of Emergency Medical, Fire, and Transportation Services**

Agency Name

Division

Anna Firestone

Contact

**1970 West Broad Street Suite 531 Columbus OH
43223-0000**

Agency Mailing Address (Plus Zip)

614-466-7014

Phone

Fax

lafiystone@dps.state.oh.us

Email

4765-7-02

Rule Number

AMENDMENT

TYPE of rule filing

Rule Title/Tag Line

Accreditation of Ohio EMS training programs.**RULE SUMMARY**

1. Is the rule being filed consistent with the requirements of the RC 119.032 review? **Yes**

2. Are you proposing this rule as a result of recent legislation? **Yes**

Bill Number: **HB1**General Assembly: **128**Sponsor: **Representative
Sykes**

3. Statute prescribing the procedure in accordance with the agency is required to adopt the rule: **119.03**

4. Statute(s) authorizing agency to adopt the rule: **R.C. 4765.11**

5. Statute(s) the rule, as filed, amplifies or implements: **R.C. 4765.16, 4765.17**

6. State the reason(s) for proposing (i.e., why are you filing,) this rule:

This rule is being filed according to a R.C. 119.032 review.

7. If the rule is an AMENDMENT, then summarize the changes and the content of the proposed rule; If the rule type is RESCISSION, NEW or NO CHANGE,

then summarize the content of the rule:

This rule sets forth the conditions under which an accredited institution may operate EMS training programs. This rule has been amended to indicate that the Board may issue a certificate of accreditation that is valid for up to five years to reflect statutory changes set forth by Am. Sub. H.B. 1, 128th General Assembly. Additionally, this rule has been amended to identify the availability of materials incorporated by reference.

8. If the rule incorporates a text or other material by reference and the agency claims the incorporation by reference is exempt from compliance with sections 121.71 to 121.74 of the Revised Code because the text or other material is **generally available** to persons who reasonably can be expected to be affected by the rule, provide an explanation of how the text or other material is generally available to those persons:

This rule incorporates the "Certificate of Accreditation Application" or form EMS 1652 (February, 2014) by reference. To comply with sections 121.71 to 121.74 of the Revised Code, this rule refers readers to rule 4765-1-03, which addresses the version/date of materials, as well as availability at http://ems.ohio.gov/ems_education.stm for this chapter and Chapters 4765-2 to 4765-10 and 4765-12 to 4765-19 of the Administrative Code.

9. If the rule incorporates a text or other material by reference, and it was **infeasible** for the agency to file the text or other material electronically, provide an explanation of why filing the text or other material electronically was infeasible:

N/A

10. If the rule is being **rescinded** and incorporates a text or other material by reference, and it was **infeasible** for the agency to file the text or other material, provide an explanation of why filing the text or other material was infeasible:

Not Applicable.

11. If **revising** or **refiling** this rule, identify changes made from the previously filed version of this rule; if none, please state so. If applicable, indicate each specific paragraph of the rule that has been modified:

Not Applicable.

12. 119.032 Rule Review Date: 5/13/2014

(If the rule is not exempt and you answered NO to question No. 1, provide the scheduled review date. If you answered YES to No. 1, the review date for this rule is the filing date.)

NOTE: If the rule is not exempt at the time of final filing, two dates are required: the current review date plus a date not to exceed 5 years from the effective date for Amended rules or a date not to exceed 5 years from the review date for No Change rules.

FISCAL ANALYSIS

13. Estimate the total amount by which *this proposed rule* would **increase / decrease** either **revenues / expenditures** for the agency during the current biennium (in dollars): Explain the net impact of the proposed changes to the budget of your agency/department.

This will have no impact on revenues or expenditures.

0

This rule is not expected to impact the agency's budget in the current biennium.

14. Identify the appropriation (by line item etc.) that authorizes each expenditure necessitated by the proposed rule:

N/A

15. Provide a summary of the estimated cost of compliance with the rule to all directly affected persons. When appropriate, please include the source for your information/estimated costs, e.g. industry, CFR, internal/agency:

This rule contains provisions that require accredited institutions to comply with curriculum standards, which includes the cost of instructional materials, instructor time and equipment as the program deems necessary. These regulations do not require an institution to provide EMS training programs, or once accredited and/or approved, to offer specific levels of training utilizing specific equipment and/or materials. The Committee estimates, however, that should an institution provide EMS training programs, its costs may range from \$5,731 to \$187,190 depending on the EMS level of training, typical class size, and instructor salaries, supplies, and equipment as the institution deems appropriate.

EMR Training EMT Training AEMT Training Paramedic Training

Training Hours 48 Hours 150 Hours 200 Hours 900 Hours

Instructor Payroll \$3,312 \$73,746 \$90,785 \$163,786

Equipment \$0 \$0 \$0 \$0

Student Supplies and equipment \$2,399 \$6514 \$8346 \$18,404

Average Expense \$5,731 \$85,260 \$104,130 \$187,190

Initial Training Tuition Range \$0-\$500 \$500-\$1200 \$1000-\$2000 \$4000-\$10,000

These rules do require institutions to gain Commission on Accreditation of Allied Health Educational Programs (CAAHEP) national accreditation. The estimated cost of initial compliance is \$0.00 after the \$5000.00 grant award pursuant to R.C. section 4765.07. The estimated annual cost to an accredited institution for continued compliance is an annual fee of \$1200.00 and approximately \$3200.00 in additional costs every five years to complete the CAAHEP reaccreditation process. These costs are charged and collected by Committee on Accreditation of Educational Programs in the Emergency Medical Services Professions (CoAEMSP).

CAAHEP Accreditation Fees and Average Grant Request

Site Visit Facilitation \$ 2700.00

First Annual CoAEMSP Fee \$1200.00

Technology Fee \$ 250.00

Self-Study Report Evaluation Fee \$ 500.00

Average Request \$4,650.00

Grant Award up to \$5000.00

Initial Estimated Cost \$0.00

Costs obtained from CoAEMSP at <http://www.coaemsp.org/Fees.htm>

Source: The estimated cost of compliance was determined by the Education Committee of the Board and replies to a statewide survey sent to all accredited institutions to ascertain adverse impact. The committee members include EMS and continuing education training program directors, EMS instructors, EMS providers, and employers for private ambulance agencies and full-time and volunteer fire departments.

16. Does this rule have a fiscal effect on school districts, counties, townships, or

municipal corporations? **Yes**

You must complete Part B of the Rule Summary and Fiscal Analysis in order to comply with Am. Sub. S.B. 33 of the 120th General Assembly.

17. Does this rule deal with environmental protection or contain a component dealing with environmental protection as defined in R. C. 121.39? **No**

S.B. 2 (129th General Assembly) Questions

18. Has this rule been filed with the Common Sense Initiative Office pursuant to R.C. 121.82? **Yes**

19. Specific to this rule, answer the following:

A.) Does this rule require a license, permit, or any other prior authorization to engage in or operate a line of business? **Yes**

This rule and other provisions in Chapter 4765-7 of the Administrative Code (O.A.C.) require institutions to receive approval from the Emergency Medical, Fire, and Transportation Services Board (Board) for a certificate of accreditation prior to offering emergency medical responder (EMR), emergency medical technician (EMT), advanced emergency medical technician (AEMT) or paramedic training programs. In addition, this rule and other provisions in O.A.C. Chapter 4765-7 require institutions to obtain and hold a current and valid certificate of national accreditation issued by Commission on Accreditation of Allied Health Educational Programs (CAAHEP) or letter of review issued by the Committee on Accreditation of Emergency Medical Services Professions (CoAEMSP) prior to offering paramedic training programs.

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? **Yes**

Failure to comply with the terms set forth in this rule may result in an application for a certificate of accreditation to be denied, while other provisions in 4765.18 of the Revised Code (R.C.) establish that the Board may impose an administrative sanction, up to and including revocation of a certificate of accreditation, for any violation of R.C. Chapter 4765 or any rule adopted under it.

C.) Does this rule require specific expenditures or the report of information as a condition of compliance? **Yes**

This rule contains provisions that require accredited institutions to comply with curriculum standards, which includes the cost of instructional materials, instructor

time and equipment as the program deems necessary. These regulations do not require an institution to provide EMS training programs, or once accredited and/or approved, to offer specific levels of training utilizing specific equipment and/or materials. The Committee estimates, however, that should an institution provide EMS training programs, its costs may range from \$5,731 to \$187,190 depending on the EMS level of training, typical class size, and instructor salaries, supplies, and equipment as the institution deems appropriate.

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Source: The estimated cost of compliance was determined by the Education Committee of the Board and replies to a statewide survey sent to all accredited institutions to ascertain adverse impact. The committee members include EMS and continuing education training program directors, EMS instructors, EMS providers, and employers for private ambulance agencies and full-time and volunteer fire departments.

Rule Summary and Fiscal Analysis (Part B)

1. Does the Proposed rule have a fiscal effect on any of the following?

(a) School Districts	(b) Counties	(c) Townships	(d) Municipal Corporations
Yes	Yes	Yes	Yes

2. Please provide an estimate in dollars of the cost of compliance with the proposed rule for school districts, counties, townships, or municipal corporations. If you are unable to provide an estimate in dollars, please provide a written explanation of why it is not possible to provide such an estimate.

This rule contains provisions that require accredited institutions to comply with the curriculum standards, which includes the cost of instructional materials, instructor time and equipment as the program deems necessary. These regulations do not require an institution to provide EMS training programs, or once accredited and/or approved, to offer specific levels of training utilizing specific equipment and/or materials. The Committee estimates, however, that should an institution provide EMS training programs, its costs may range from \$5,731 to \$187,190 depending on the EMS level of training, typical class size, and instructor salaries, supplies, and equipment as the institution deems appropriate.

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Educational Programs in the Emergency Medical Services Professions
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3. If the proposed rule is the result of a federal requirement, does the proposed rule exceed the scope and intent of the federal requirement? **No**
4. If the proposed rule exceeds the minimum necessary federal requirement, please provide an estimate of, and justification for, the excess costs that exceed the cost of the federal requirement. In particular, please provide an estimate of the excess costs that exceed the cost of the federal requirement for (a) school districts, (b) counties, (c) townships, and (d) municipal corporations.

Not Applicable.

5. Please provide a comprehensive cost estimate for the proposed rule that includes the procedure and method used for calculating the cost of compliance. This comprehensive cost estimate should identify all of the major cost categories including, but not limited to, (a) personnel costs, (b) new equipment or other capital costs, (c) operating costs, and (d) any

indirect central service costs.

This rule requires accredited institutions to comply with the curriculum standards, established in O.A.C. Chapters 4765-12, 4765-15, 4765-16, and 4765-17, which includes the cost of instructional materials, instructor time and equipment as the program deems necessary. Additionally, this rule do requires accredited institutions, who wish to operate paramedic training programs, to gain Commission on Accreditation of Allied Health Educational Programs (CAAHEP) national accreditation.

These regulations do not require an institution to provide EMS training programs, or once accredited and/or approved, to offer specific levels of training utilizing specific equipment and/or materials. However, should an institution provide EMS training programs, its costs may range from \$5,731 to \$187,190 depending on the EMS level of training, typical class size, and instructor salaries, supplies, and equipment as the institution deems appropriate..

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Initial Training Tuition Range \$0-\$500 \$500-\$1200 \$1000-\$2000 \$4000-\$10,000

This rule does require institutions to operate paramedic training programs. However, should an institution provide paramedic training programs, the estimated cost of initial compliance is \$0.00 after the \$5000.00 grant award pursuant to R.C. section 4765.07. The estimated annual cost to an accredited institution for continued compliance is an annual fee of \$1200.00 and approximately \$3200.00 in additional costs every five years to complete the CAAHEP reaccreditation process. These costs are charged and collected by Committee on Accreditation of Educational Programs in the Emergency Medical Services Professions (CoAEMSP).

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(a) Personnel Costs

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(b) New Equipment or Other Capital Costs

\$0

(c) Operating Costs

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Grant Award up to \$5000.00

Initial Estimated Cost \$0.00

(d) Any Indirect Central Service Costs

\$0

(e) Other Costs

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6. Please provide a written explanation of the agency's and the local government's ability to pay for the new requirements imposed by the proposed rule.

This rule will have no impact on either revenues or expenditures and is not expected to impact the agency's budget in the current biennium.

The Board administers grant awards set forth in R.C. section 4765.07, and as defined in R.C. section 4513.263. First priority includes awards to EMS organizations for the training of personnel, the purchase of equipment and to improve accessibility and quality of emergency medical services in this state. Sixth priority is a grant award of up to \$5000.00 per EMS institution for expenses incurred in seeking national accreditation of its paramedic program. Eligible expenses include the site visit facilitation costs, the first annual CAAHEP fee, the one-time technology fee and the application/self-study evaluation fee. Grant funds are distributed through a reimbursement process as costs are incurred by the grantee. The Division of EMS website includes a grants web page that summarizes distribution details and provides grant applications. The EMS web page can be found using the following link: www.ems.ohio.gov.

7. Please provide a statement on the proposed rule's impact on economic development.

This rule is not expected to impact economic development.