

Note: Email completed form to jcarr1@jcarr.state.oh.us.

Hearing Date: 10/17/2018

Today's Date: 10/18/2018

Agency: Ohio Department of Public Safety, [Division of Emergency Medical Services (EMS)]

Rule Number(s): 4765-8-05

If no comments at the hearing, please check the box. ☐

List organizations or individuals giving or submitting testimony before, during or after the public hearing and indicate the rule number(s) in question.

1. Chuck Sowerbrower, Sinclair Community College – Submitted Questions 9/17/18.

2. Click here to enter text.

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Hearing Summary Report

Consolidated Summary of Comments Received

Please review all comments received and complete a consolidated summary paragraph of the comments and indicate the rule number(s).

Questions regarding administration of the rule provisions were asked in an e-mail from Chuck Sowerbrower of Sinclair Community College on September 17, 2018. Mr. Sowerbrower's questions, along with Division of EMS responses were introduced as Exhibit 1 at the hearing on 10/17/18.

Hearing Summary Report

Incorporated Comments into Rule(s)

Indicate how comments received during the hearing process were incorporated into the rule(s).
If no comments were incorporated, explain why not.

No Changes were made to the rules based on the questions asked by Mr. Sowerbrower. Mr. Sowerbrower's questions related to the administration of the National Registry Initial Certification Examination, not to the rule itself. The Division fo EMS answered Mr. Sowerbrower's questions on October 4, 2018. The questions and answeres were introduced as Exhibit 1 at the public hearing. Exhibit 1 is attached for reference.

From: Owens, Ellen
Sent: Thursday, October 04, 2018 11:51 AM
To: Sowerbrower, Chuck
Subject: RE: OAC Rule 4765-8-05 (amended) filed with JCARR; public hearing scheduled for October 17, 2018

Follow Up Flag: Follow up
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Hi, Chuck.

Please accept my apologies for failing to respond to your questions below. Our staff met to discuss implementation of the proposed rule, which included your concerns, and I missed circling back around to you. Thank you for providing us with implementation questions from the Program Director point of view. The timeline being added in our rule is not a change, but rather a codification of the requirements that have been in place for many years under the National Registry policies. The change will be in who will be monitoring the timelines for Ohio certification. I will address each of your questions/concerns as presented:

- 1) Program coordinators do not have access to the dates when tests occur (unless the test happens at their own site)
 - a. Without a change in the data from NREMT, I do not know how we can be expected to manage this.

The current rules require the programs to notify the students of the process for testing and certification. The information regarding the results of the written and practical exams only remaining valid for one year, based on past National Registry requirements, should be part of the information currently provided by the schools. The information will need updated since issuance of a National Registry certificate will no longer automatically mean eligibility for Ohio certification. I anticipate a template will be drafted that can be used by the schools with the ability to add school-specific notification requirements. The automated messages that are currently being sent out by our system when the school verifies course completion and eligibility for Ohio certification will also be updated to include reminders to the students of the time constraints on completing components of the examination and for making application for certification.

At the Advanced and Paramedic levels, (unless there has been a recent change) I believe the program director can see the date when a student passed the practical examination even if the student had to retest at another location. If the student is beyond the one-year time limit, she/he would need to complete a new practical examination before the school approves the student to begin the Ohio application process. Currently, a student can register for the practical exam at any school. If they are not on the National Registry roster of students, the students can still test. We will be meeting with the National Registry to discuss a process for sending those skill sheets to our office for final review. Our office could then notify the school of the new practical exam date. We will also be making changes to our course tracking site to better track the exam dates.

At the EMR and EMT level, the Program Director currently lists the completion date of the practical exam in our course tracking system. If the exam is more than one year old when the written exam is passed, the student can return to the school of training to retake the practical. If the school wants to accept a practical exam conducted by another accredited school, verification of the examination would need to be provided to the school that provided the EMR/EMT course to the student. We are looking at possible changes in the course tracking system to allow for the input of the new practical exam date.

- 2) If a student has to retake the cognitive exam AFTER the NREMT has already given that person a certification card, I assume the student will need to use the assessment test.
 - a. There will need to be a process in place so we can direct the student correctly.

The assessment exam is currently being used for various purposes in Ohio (EMS instructor knowledge exam, examination in lieu of continuing education, students under the age of 18, and reinstatement examinations). These requests are currently reviewed by DEMS staff to determine eligibility for the requested exams, and the approval for testing is made by our office. We will be working with the National Registry to discuss the possibility of adding a reason for testing to specifically address these students and we can certainly create an outline of the process to provide to students. We recognize there will always be reasons why a student may not be able to complete both the written and practical examination and make application for certification within 1 year of course completion. However, we believe the number can be kept to a minimum with the testing and certification guidance provided to students at the end of the course, and repeated notifications through the DEMS email notifications.

- 3) Regarding the practical exam, it needs to be clear when the date of the exam occurs ...
 - a. Consider a paramedic student who takes and passes 4 of the 6 stations on 01/01/18.
 - b. She then retests and passes the other 2 stations on 03/01/18.
 - i. Which date is used?

The intent is to continue to follow the policy that has been used by the National Registry for many years. In the scenario you provided, the recorded exam date would be 3/1/2018 as that is the date when the student successfully completed a full practical examination.

I hope I have addressed your questions/concerns. We will continue to work with our EMS partners to work through any concerns regarding the examination and certification process. Please contact me if you have further concerns or questions.

Ellen

Ellen Owens
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www.ems.ohio.gov



What will you do today to contribute to a safer Ohio?



From: Sowerbrower, Chuck <chuck.sowerbrower@sinclair.edu>
Sent: Monday, September 17, 2018 1:22 PM

To: Owens, Ellen <EOwens@dps.ohio.gov>

Subject: FW: OAC Rule 4765-8-05 (amended) filed with JCARR; public hearing scheduled for October 17, 2018

Ellen,

Good afternoon

In reference to this rule change regarding the length of time a test is valid, I believe at least the following concerns need to be addressed

- 1) Program coordinators do not have access to the dates when tests occur (unless the test happens at their own site)
 - a. Without a change in the data from NREMT, I do not know how we can be expected to manage this.
- 2) If a student has to retake the cognitive exam AFTER the NREMT has already given that person a certification card, I assume the student will need to use the assessment test.
 - a. There will need to be a process in place so we can direct the student correctly.
- 3) Regarding the practical exam, it needs to be clear when the date of the exam occurs ...
 - a. Consider a paramedic student who takes and passes 4 of the 6 stations on 01/01/18.
 - b. She then retests and passes the other 2 stations on 03/01/18.
 - i. Which date is used?

This is something the board feels is important. So I want to make sure we do this effectively

Thanks

Chuck




From: Ohio EMS <OhioEMS@info.dps.ohio.gov>

Sent: Monday, September 17, 2018 12:56 PM


To: Sowerbrower, Chuck <chuck.sowerbrower@sinclair.edu>

Subject: OAC Rule 4765-8-05 (amended) filed with JCARR; public hearing scheduled for October 17, 2018



SAFETY SERVICE PROTECTION

OHIO EMERGENCY MEDICAL SERVICES



Ohio Emergency Medical Services
Melvin House, Executive Director
www.ems.ohio.gov

ANNOUNCEMENT

Ohio law authorizes state agencies to adopt, amend, or rescind rules in accordance with Chapter 119. of the Revised Code (RC).

Amended rule 4765-8-05 (*Examinations.*) was filed with the Joint Committee on Agency Rule Review (JCARR) on September 14, 2018.

Chapter 8 (*Certificate to Teach or Practice; Continuing Education*)

4765-8-05

Amend

Examinations.

The rule is proposed for amendment to state in rule existing policy that makes successfully completed written and practical portions of examinations for those seeking to be certified or seeking renewal of a certificate to practice as an EMR, EMT, AEMT, or paramedic valid for one year from the date of completion.

Please review the rule and information about the public hearing scheduled for October 17, 2018 at the *EMS Small Business Regulatory Impact - Proposed Rules and Public Hearing Notices* Web page, using the following link: [Proposed Rules and Public Hearing Notices](#).

DISCLAIMER: THIS IS A SUMMARY OF KEY CHANGES ONLY. NOT ALL OF THE CHANGES ARE LISTED. PLEASE REFER TO THE RESPECTIVE INDIVIDUAL RULE TO SEE THE COMPLETE CHANGES FOR EACH RULE.

Contact the Division of EMS about the State Board of Emergency Medical, Fire, and Transportation Services (EMFTS) administrative rules at ems.rules@dps.ohio.gov.

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www.publicsafety.ohio.gov

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