

**MEMORANDUM**

**TO:** Pam Watkins, Ohio Department of Public Safety

**FROM:** Paula Steele, Regulatory Policy Advocate

**DATE:** April 4, 2013

**RE:** **CSI Review – EMS Curricula, Continuing Education and Scopes of Practice**  
(OAC 4765-15-01, 4765-15-03 through 4765-15-05, 4765-16-01 through 4765-16-06,  
OAC 4765-17-01 through 4765-17-04)

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On behalf of Lt. Governor Mary Taylor, and pursuant to the authority granted to the Common Sense Initiative (CSI) Office under Ohio Revised Code (ORC) section 107.54, the CSI Office has reviewed the abovementioned administrative rule package and associated Business Impact Analysis (BIA). This memo represents the CSI Office's comments to the Agency as provided for in ORC 107.54.

**Analysis**

The Ohio Department of Public Safety's rule package consists of fifteen proposed rules, all of which are existing rules being reviewed under the five-year review requirement of ORC 119.032. Four proposed rules are being amended and the remaining eleven rules are being proposed as no-change rules. The proposed rules address curriculum standards, continuing education requirements, and scopes of practice for emergency medical technicians (EMTs), advanced emergency medical technicians (AEMTs) or paramedics. The draft rules were filed with the CSI Office on March 7, 2013 with a public comment period ending on March 18, 2013. During that period, no public comments were submitted.

The amended rules are being changed to accommodate statutory requirements of recently-enacted House Bill 284, update an administrative code reference, and include verbiage about the use of epinephrine auto injectors in the scope of practice. According to the Department, while not required by federal law, the proposed rules comply and align with a national initiative for EMS (emergency medical service) education and training that is approved by the U.S. National

Highway Traffic Safety Administration, which oversees federal EMS programs.

According to the BIA, this draft rule package was reviewed by the EMS education and medical oversight committees representing a reasonable cross-section of emergency medical professional stakeholders.

The BIA acknowledges the rules include adverse impacts to business and affect EMS training institutions, training instructors, and those individuals seeking certification as EMS providers. The Department identifies the impacts as the training programs' hours and cost to students, continuing education hours and cost, and the training institutions' cost to comply with the State curriculum. Depending on the program certification, hours of training range from 130 to 900 hours and tuition from \$500 to \$10,000. The general business expense of providing training that meets the current medical standard of care averages approximately \$85,000 for EMT, \$104,000 for AEMT, and \$187,000 for paramedic programs. These cost estimates include instructor salaries and benefits, equipment, operations, and indirect services.

After reviewing the proposed rules and a revised BIA, the CSI Office determined that the rules satisfactorily meet the standards espoused by the CSI Office, and the purpose of the rules justifies the adverse impact identified in the BIA.

### **Recommendations**

For the reasons discussed above, the CSI Office does not have any recommendations for this rule package.

### **Conclusion**

Based on the above comments, the CSI Office concludes that the Ohio Department of Public Safety should proceed with the formal filing of this rule package with the Joint Committee on Agency Rule Review.

cc: Mark Hamlin, Director of Regulatory Policy