

**MEMORANDUM**

**TO:** Pamela Watkins, Rules Administrator, Ohio Department of Public Safety

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

**DATE:** April 29, 2014

**RE:** **CSI Review – Emergency Medical Responder Curriculum, Continuing Education and Scope of Practice (OAC 4765-12-01 through 4765-12-05)**

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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**

This rule package consists of five amended rules proposed by the Ohio Department of Public Safety (ODPS) as a five-year rule review as required by ORC 119.032. The draft rules address emergency medical responder (EMR) training, educational requirements and scope of practice. The draft rules were submitted to the CSI Office on February 24, 2014 with the comment period ending on March 12, 2014. There were no public comments received during the public comment period.

EMRs, also known as first responders, must be certified to practice. EMRs typically serve as volunteers for nonprofits; however, the Board can waive the volunteer requirements if an applicant requests it in writing and meets certain criteria. The proposed rules also articulate the curriculum and required amounts of training for certification in addition to the continuing education for certificate renewals. Finally, the proposed rules define an EMR's scope of practice which includes first aid procedures and other emergency medical services with the authorization of specific qualified health care professionals. Amendments to the draft rules address materials incorporated by reference, allow for specific treatment of patients suffering from allergic reactions of opiate overdose and implement statutory changes which expand the list of health care professionals that could authorize treatment.

The BIA describes a comprehensive stakeholder outreach process which resulted in suggestions that were incorporated into the rules, such as the addition of the administration of epinephrine via auto-injectors and naloxone via intranasal route for treatment of anaphylaxis (allergic reaction) and opiate overdose, respectively.

Upon review of the proposed rules and 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, Lt. Governor's Office