

**MEMORANDUM**

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

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

**DATE:** March 31, 2014

**RE:** **CSI Review – Accreditation of EMS Training Programs** (OAC 4765-7-01 through 4765-7-13)

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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 thirteen rules – four no change and nine amended<sup>1</sup> 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 the accreditation of EMS training programs. 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.

The rules set forth conditions for which certificate of accreditation or a certificate of approval to operate EMS training programs are approved, renewed, reinstated or denied. Most amendments are minor or have been updated to comport with legislative updates. However, rule 4765-7-12 was revised significantly in order to update technical terms for online education and distance learning delivery systems.

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<sup>1</sup>One of the existing rules is being amended by more than 50 percent, therefore the Legislative Service Commission requires that the existing rule be rescinded and replaced by a new rule that has the same rule number.

The BIA describes a comprehensive stakeholder outreach process which resulted in multiple suggestions that were incorporated into the rules, such as consistent use of terminology, certain compliance requirements and classroom setting testing requirements.

The CSI Office followed up with the Department to request a minor addition to the BIA. Upon review of the proposed rules and 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, Lt. Governor's Office