

**MEMORANDUM**

**TO:** Joseph Kirk, Ohio Department of Public Safety

**FROM:** Jacob Ritzenthaler, Regulatory Policy Advocate

**DATE:** February 15, 2018

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

---

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 contains eight amended rules and five no-change rules proposed by the Ohio Department of Public Safety (ODPS) as part of the statutory five-year rule review requirement. The rule package was submitted to the CSI Office on December 1, 2017 and the public comment period was held open through December 26, 2017. No public comments were received during this time.

The rules included in this rule package set forth the requirements for the accreditation of emergency medical services (EMS) training programs by the Ohio State Board of Emergency Medical, Fire, and Transportation Services (EMFTS Board). The rules cover the application for a certificate of accreditation, the renewal or reinstatement of a certificate, and the provision of continuing education and EMS training. Ohio Administrative Code (OAC) 4765-7-02, 4765-7-04, 4765-7-08, 4765-7-09, 4765-7-10, and 4765-7-12 are being amended to make corrections to typographical errors and update references within the rules. Amendments to the other rules are also being made to establish the process for initial applicants for paramedic training program

**77 South High Street | 30th Floor | Columbus, Ohio 43215-6117**  
**[CSIOhio@governor.ohio.gov](mailto:CSIOhio@governor.ohio.gov)**

accreditation and to clarify student pass rate requirements. OAC 4765-7-01, 4765-7-05, 4765-7-06, 4765-7-11, and 4765-7-13 are being proposed without changes.

During early stakeholder outreach, the rules were reviewed by the Education Committee and the Medical Oversight Committee of the EMFTS Board, which include members of the EMS industry. ODPS received suggestions regarding correcting typographical errors, the application process for initial paramedic training program applicants, and the student pass rate requirements. These suggestions were accepted and amendments were made to the rules. No comments were received during the CSI public comment period.

The business communities impacted by these rules include EMS organizations, EMS providers, EMS accredited institutions, and institutions offering EMS continuing education programs. According to the BIA, these communities include 1,330 EMS organizers, 41,500 EMS providers, 89 accredited institutions, and 551 continuing education institutions. The adverse costs created by these rules include the time and cost of acquiring and maintaining accreditation, specifically national accreditation through the Commission on Accreditation of Allied Health Educational Programs (CAAHEP). ODPS states that the cost to accredited institutions is a \$1,700 annual fee and a \$3,450 reaccreditation fee every five years. A \$500 fee is required yearly for institutions utilizing offsite locations for instruction. Prior to the rules taking effect, on January 1, 2018, ODPS made available \$5,000 grant awards to help institutions obtain CAAHEP accreditation. In the BIA, ODPS states that the costs created by the rules are necessary to ensure professional standards for training providers. After reviewing the proposed rules and the BIA, the CSI Office has determined that the rules satisfactorily meet the standards espoused by the CSI Office, and the purpose of the rule package is justified.

### **Recommendations**

For the reasons described above, the CSI Office has no recommendations on this rule package.

### **Conclusion**

Based on its review of the proposed rule package, the CSI Office recommends the Ohio Department of Public Safety should proceed in filing the proposed rules with the Joint Committee on Agency Rule Review.