

**MEMORANDUM**

TO: Joseph Kirk, Ohio Department of Public Safety

FROM: Jacob Ritzenthaler, Regulatory Policy Advocate

DATE: December 10, 2018

RE: CSI Review – EMT Curriculumms (OAC 4765-6-01 through 4765-6-07)

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 two amended rules, four no-change rules, and one new rule proposed by the Ohio Department of Public Safety (ODPS). The rule package was submitted to the CSI Office on August 21, 2018 and the public comment period was held open through September 13, 2018. No comments were received during this time.

The rules in this package set forth curriculum guidelines for emergency medical service (EMS) training programs, as well as procedures for medical services outside the scope of practice for EMS providers. Ohio Administrative Code (OAC) 4765-6-01 sets forth the procedures for evaluating and approving additional medical services and is being amended to update the website referenced in the rule. OAC 4765-6-02 sets forth the general provisions of the rule and is being amended to update the references of the rule and remove information that will be included in another rule. OAC 4765-6-03 through 4765-6-06 set forth scope of practice guidelines, including emergency use of additional services, research studies, nerve and organophosphate agents, and withdrawing blood for evidence collection. These rules are being submitted without changes. OAC

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4765-6-07 is a new rule that establishes training requirements for training programs to utilize Rescue Task Force Awareness Training.

During early stakeholder outreach, ODPS reviewed the proposed rules with the Ohio State Board of Emergency Medical, Fire, and Transportation Services (EMFTS Board). OAC 4765-6-07 was drafted by a committee formed by the EMFTS Board, which included EMS personnel and various state agencies. No comments were received during the CSI public comment period.

The business community impacted by these rules includes all EMS providers and instructors in the state, as well as EMS training and continuing education institutions. ODPS states in the BIA that there are 41,351 EMS providers and 5,157 EMS instructors currently operating, in addition to 90 EMS training institutions and 538 EMS continuing education institutions. ODPS states that the cost of including additional services can vary based on the number and type of services that each organization adopts. EMS training programs must incorporate knowledge and skill standards that are unique to emergency medical responders, emergency medical technicians, advanced emergency medical technicians, and paramedics. Additionally, beginning on September 1, 2019, Rescue Task Force Awareness Training will be required for EMS training programs. ODPS states in the BIA that it has developed a training module that EMS organizations can use for no cost.

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.