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John R. Kasich, Governor  
Thomas P. Charles, Director

**Melvin R. House**  
Executive Director

Emergency Medical Services  
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Columbus, Ohio 43218-2073  
(614) 466-9447 • (800) 233-0785  
[www.ems.ohio.gov](http://www.ems.ohio.gov)

April 10, 2013

Paula Steele  
Regulatory Policy Advocate  
Common Sense Initiative Office  
77 South High Street, 30<sup>th</sup> Floor  
Columbus, Ohio 43215-6117

Dear Ms. Steele,

Thank you for your review of the business impact analysis for Chapters 4565-15, 16 and 17 of the Administrative Code (EMS curriculum and scope of practice). The Ohio Department of Public Safety (ODPS), Division of Emergency Medical Services (EMS), has received and read your review, recommendations, and conclusions.

On Friday, May 17, 2013, the Division of EMS intends to formally file Chapters 4565-15, 16 and 17 of the Administrative Code and all required materials with the Joint Committee on Agency Rule Review and the Legislative Service Commission. The Division of EMS plans to conduct a public hearing pursuant to R.C. 119.03 on Wednesday, June 19, 2013 at the Ohio Department of Public Safety, Room 134, 1970 West Broad Street, Columbus Ohio, 43223. The Division of EMS anticipates final-filing the rule with an effective date of August 22, 2013.

Sincerely,

Melvin R. House, Executive Director  
Division of Emergency Medical Services

**Mission Statement**

*"to save lives, reduce injuries and economic loss, to administer Ohio's motor vehicle laws and to preserve the safety and well being of all citizens with the most cost-effective and service-oriented methods available."*



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July 3, 2013

Paula Steele, Regulatory Policy Advocate  
Common Sense Initiative Office  
77 South High Street, 30<sup>th</sup> Floor  
Columbus, Ohio 43215-6117

Dear Ms. Steele,

On April 3, 2013, the Department of Public Safety, Division of Emergency Medical Services filed chapters 4765-15, 4765-16 and 4765-17 of the Administrative Code (OAC) with the Common Sense Initiative (CSI) Office pursuant to 119.032 of the Revised Code (ORC). On April 4, 2013, the Division of EMS received notice from the CSI Office to proceed with the formal filing with the Joint Committee on Agency Rule Review JCARR).

On Wednesday, June 19, 2013, the State Board of EMS (EMS Board) voted to amend rule OAC 4765-15-04(B)(15) dealing with the EMT scope of practice to read as follows: "Administration of epinephrine auto-injector, to a patient suffering from anaphylaxis." The change clarified the EMT scope of practice, allowing immediate care to a patient suffering from a life-threatening allergic reaction.

The Division of EMS proposes to file OAC 4765-16-05 as a "no change" rule. The remaining rules in OAC chapters 4765-15, 4765-16 and 4765-17 have been amended to address the materials incorporated by reference in compliance with ORC section 121.71 through section 121.74. No additional adverse impact resulted from changes to the amended rules.

The changes to OAC 4765 chapters 4765-15, 4765-16 and 4765-17 do not conflict with, duplicate, or overlap the authority of the Board of Pharmacy. ORC section 4729 and OAC chapter 4729 set forth the standards for licensure of pharmacists and pharmacy technicians. OAC chapter 4729 also sets forth the standards for licensure, distribution, security and storage of dangerous drugs. OAC chapter 4729-33 sets forth the conditions under which an EMS agency may hold and maintain a license as terminal distributor of dangerous drugs.

OAC chapters 4765-15, 4765-16 and 4765-17 set forth the curriculum standards to obtain and renew a certificate to practice as an EMS provider issued by the EMS Board. The OAC chapters also set forth the emergency medical services that may be performed by an EMS provider and the conditions under which the services may be performed.

If you have any questions or if I may be of any further assistance, please do not hesitate to contact me.

Sincerely,

Melvin R. House, Executive Director  
Division of Emergency Medical Services  
Ohio Department of Public Safety

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