MEMORANDUM

TO: Pam Watkins, Ohio Department of Public Safety

FROM: Paula Steele, Regulatory Policy Advocate

DATE: September 11, 2012

RE: **CSI Review – (OAC 4765-1-01, 4765-7-02, 4765-7-133) National Accreditation of Ohio Paramedic Training Programs**

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

Ohio Department of Public Safety's rule package consists of two amended rules and one new rule. The draft rules include definitions, accreditation requirements of Ohio Emergency Medical Services (EMS) training programs, and national accreditation requirements of paramedic programs. The draft rules were filed with the CSI Office on August 17, 2012 with a public comment period ending on September 2, 2012. During that period, there were no public comments submitted.

The intent of the changes is to ensure Ohio EMS and paramedic training programs keep pace with a national initiative to have all certificate holders accredited under a national program. According to the Department, an Ohio candidate who does not graduate from a nationally accredited paramedic program will not receive national certification. National accreditation and certification enables paramedic students to successfully compete in Ohio's job market, as well as those of neighboring states if employed with EMS organizations that engage in inter-state patient transportation.

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This draft rule package was developed by two subcommittees of EMS Board members representing a reasonable cross-section of stakeholders including fire service organizations, hospitals, emergency medical physicians, EMS and paramedic education institutions. Stakeholder input was incorporated to make the revisions in the rules.

The BIA identified 45 accredited institutions operating paramedic training programs that will be impacted by the regulation because of the initial cost of compliance. However, the Department states that the initial cost will be entirely mitigated by a $5,000 grant. According to the education committee of the EMS Board, subsequent annual costs to comply will be funded through increases in student tuition of up to $20 per student. While the amount of time to seek compliance was not addressed in the BIA, Ohio is one of only three states that has not approved national accreditation. Further, bordering states have approved national accreditation requirements and therefore, in order to remain competitive, national accreditation requirements are justified.

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, Director of Regulatory Policy