

**Department of
Public Safety**

Mike DeWine, Governor
Jon Husted, Lt. Governor

Andy Wilson, Director
Robert L. Wagoner, Executive Director

April 13, 2023

Jacob Ritzenthaler
Business Advocate
Common Sense Initiative Office
77 South High Street, 30th Floor
Columbus, Ohio 43215-6117

Dear Mr. Ritzenthaler:

Thank you for your review of the business impact analysis for Ohio Administrative Code (O.A.C.) chapters 4765-7 (*Accreditation of Training Programs*); 4765-12 (*First Responder Certification*); 4765-15 (*EMT-Basics*); 4765-16 (*EMT-Intermediates*); 4765-17 (*EMT-Paramedics*); and 4765-19 (*Emergency Medical Services Continuing Education*). The Ohio Department of Public Safety (ODPS), Division of Emergency Medical Services (EMS) has received and read your reviews, recommendations, and conclusions.

In June 2023, the Division of EMS intends to formally file the rules and all required materials with the Joint Committee on Agency Rule Review (JCARR), the Ohio Legislative Service Commission (LSC), and the Secretary of State. When the rules are filed with JCARR, one additional amendment will be made to paragraph (A)(7) of rule 4765-7-02 (*Accreditation of Ohio EMS training programs*):

(7) Has a sufficient number of EMS instructors ~~or assistant-EMS instructors~~ to ensure the ratio of instructors to students in all practical skills components of the EMS training program does not exceed one to ten;

The additional amendment will be included due to the provisions of House Bill (HB) 52 (*Reverse H.B. 509/134th GA changes to EMS training, continuing ed*), which became effective on April 6, 2023. The provisions in HB 509 that eliminated the emergency medical services assistant instructor certificate were not reversed by HB 52. The emergency medical services assistant instructor certificate was eliminated effective April 6, 2023.

The Division of EMS plans to conduct a public hearing pursuant to Revised Code 119.03 in August 2023. The Division of EMS anticipates final-filing the rules with an effective date in October 2023.

Regards,

Robert L. Wagoner
Executive Director
Ohio Department of Public Safety
Division of Emergency Medical Services

cc: Joseph Baker, Director, Common Sense Initiative Office
Joseph A. Kirk, ODPS Rules Coordinator
Michael Wise, ODPS Associate Legal Counsel