

EMERGENCY MEDICAL SERVICES AUTHORITY

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DATE: September 17, 2014

TO: Commission on EMS

FROM: Howard Backer, MD, MPH, FACEP
Director

PREPARED BY: Lisa Witchey, Manager
Personnel Standards Unit

SUBJECT: Chapter 1.5 Regulations: First Aid Standards for Public Safety Personnel

RECOMMENDED ACTION:

Approve Proposed Changes to Chapter 1.5 Regulations: First Aid and CPR Standards and Training for Public Safety Personnel.

FISCAL IMPACT:

Providers of Public Safety First Aid training courses may experience increased costs associated with the addition of certain course content items.

DISCUSSION:

The Emergency Medical Services Authority (Authority) has proposed revisions to the Public Safety Regulations to address areas that are outdated. The proposed regulations clarify which skills public safety personnel are authorized to perform following training and demonstrated competency, and add optional skills that may be approved by the local EMS agency Medical Director.

Proposed changes to the regulations include replacing the outdated First Responder course curriculum with the current National EMR education standards; adding optional skills such as epinephrine, oxygen, naloxone, oropharyngeal and nasopharyngeal airways; and adding training elements of Tactical First Aid for public safety first aid personnel to the basic course content.

The Authority held an informal public comment period from December 20, 2013 through February 2, 2014 to solicit feedback from stakeholders and the public prior to initiating the formal rulemaking process. The Authority opened rulemaking with the Office of Administrative Law on May 23, 2014, and held a 45-day public comment period from May 23, 2014 through July 7, 2014 and a public hearing on July 7, 2014 to solicit feedback from stakeholders and the public. The Authority subsequently revised the proposed regulations and held a 15-day comment period from August 1, 2014 through August 15, 2014.

Changes included in the 15-day comment period included:

- Removing nasopharyngeal airways (NPAs) from the proposed course content, and adding NPAs to the list of optional skills.
- Clarifying tactical training elements within the proposed course content.
- Removing training timeframe and medical director approval associated with hemostatic dressings.
- Clarifying the use of AHA ECC standards for CPR to not include AED training.
- Extending the timeframe for training programs to be in compliance with regulations from six (6) months to twenty-four (24) months after the regulations are effective.
- Eliminating the proposed skills verification form.
- Specifying “Authorized Skills” rather than “Scope of Practice”, and requiring completion of training and demonstration of competence prior to use of authorized skills.
- Removing SIDS training from the proposed regulations.
- Reducing the length of the optional AED training from four (4) hours to two (2) hours.

Upon consideration of comments received during the 15-day comment period regarding the timeframe to implement course topics and provide required training, a second 15-day comment period will be held from August 20, 2014 through September 3, 2014 and a comment table with EMSA’s responses, along with the final text of the proposed regulations will be provided to the Commissioners and posted on EMSA’s website (www.emsa.ca.gov/public_comment)

Key Concerns:

Based upon comments received during the 45-day and 1st 15-day comment periods, key areas of concern with the proposed regulations include:

- The requirement for LEMSA approval of courses that are based on training standards of the American Red Cross, American Heart Association or equivalent will create a new workload for the LEMSA.
- Concern that AED training should be a basic course training topic, and not an optional skill.
- Concern that Tactical First Aid training will require additional course time and may be better provided as a separate course.

Estimated Regulation and Rulemaking Timeline

- October 1, 2014 Submit to OAL for review and approval
- November 15, 2014 Regulations approved, filed with Secretary of State
- January 1, 2015 Regulations are effective
- January 1, 2017 All approved Chapter 1.5 courses shall comply with the approved regulations

The following documents are attached:

- Proposed Chapter 1.5 regulations: revised August 15, 2014.
- Proposed Chapter 1.5 regulations: revised August 1, 2014.
- 45-day comment table with responses.