

**FISCAL NOTE
PRIVATE COST**

- I. Department Title: Missouri Department of Health and Senior Services
Division Title: Division of Regulation and Licensure
Chapter Title: Chapter 40-Comprehensive Emergency Medical Services System
Regulations:**

Rule Number and Title:	19 CSR 30-40.800
Type of Rulemaking:	Proposed Rule

II. SUMMARY OF FISCAL IMPACT

Estimate of the number of entities by class which would likely be affected by the adoption of the rule:	Classification by types of the business entities which would likely be affected:	Estimate in the aggregate as to the cost of compliance with the rule by the affected entities:
EMT-CP's		\$2,661,000 for the first five year period \$268,500 annually thereafter
Privately owned ambulance services		\$300,000 for the first five year period \$15,000 annually thereafter
Privately owned EMS training entities		\$430,750 for the first five year period \$31,350 annually thereafter
Total		\$3,391,750 for the first five year period \$314,850 annually thereafter

III. WORKSHEET

(1) EMT-Community Paramedic's (EMT-CP's) costs.

A. Costs for recertification continuing education hours.

EMT-CP's are required to apply for recertification of their EMT-CP at the same time that they reapply for their EMT-Paramedic (EMT-P) license. EMT-P licenses are issued for a period of five years. In addition to the 144 continuing education hours required for relicensure as an EMT-P, EMT-CPs are required to complete four (4) hours of continuing education annually relating to the community paramedic topics outlined in (2)(A)2.A-E of the proposed rule. Therefore, the number of continuing education hours he/she will need to have obtained before he/she applies for EMT-P relicensure/EMT-CP recertification will vary depending on when the EMT-CP's EMT-P license expires. The EMS Bureau is anticipating that of the 100 EMT-CP's who will apply for EMT-P

relicensure/EMT-CP recertification each year, 20 will need 4 hours of continuing education, 20 will need 8 hours of continuing education, 20 will need 12 hours of continuing education, 20 will need 16 hours of continuing education and 20 will need 20 hours of continuing education. The average cost of continuing education hours is \$30 per clock hour. There is no fee to be certified or recertified as an EMT-CP or to be licensed or relicensed as an EMT-P.

20 applicants X 4 X \$30 per hour = \$2,400
20 applicants X 8 X 30 per hours = \$4,800
20 applicants X 12 X \$30 per hour = \$7,200
20 applicants X 16 X \$30 per hour = \$9,600
20 applicants X 20 X \$30 per hour = \$12,000

$\$2,400 + \$4,800 + \$7,200 + \$9,600 + \$12,000 = \$36,000$ for the first five (5) year period.

The EMS Bureau anticipates 50 EMT-CP applicants will need to complete 4 continuing education hours per year annually thereafter.

$50 \times 4 \times \$30 = \$6,000$ annually thereafter.

B. Costs for EMT-CP training program.

The EMS Bureau anticipates the cost EMS training entities will charge for the EMT-CP program (tuition) will be approximately half of the cost of EMT-P programs because the EMT-CP program has considerably less hours of training. The average cost of the EMT-P program is \$8,500. Therefore, the EMS Bureau anticipates the cost of the EMT-CP program will be \$4,250. The EMS Bureau also anticipates incidental costs for books, drug screening, uniforms and mileage to and from clinical sites to be approximately \$1,000. The EMS Bureau currently has over 7000 licensed EMT-Ps who would be eligible to attend an EMT-CP program. The EMS Bureau anticipates there will be approximately 100 applicants who will attend and complete an EMT-CP program during the first five year period.

$(\$4,250 + \$1,000) \times 100 \times 5 = \$2,625,000$ for the first five year period.

The EMS Bureau anticipates there will be approximately 50 applicants who attend and complete an EMT-CP program annually thereafter.

$(\$4,250 + \$1,000) \times 50 = \$262,500$ annually thereafter.

Total costs for EMT-CP's

$\$36,000$ (costs for continuing education for recertification) + $\$2,625,000$ (EMT-CP training costs) = $\$2,661,000$ for the first five year period.

$\$6,000$ (costs for continuing education for recertification) + $\$262,500$ (EMT-CP training costs) = $\$268,500$ annually thereafter.

(2) Privately owned Ambulance Services.

A. Medical Directors.

There are currently 217 ground ambulance services, 22 of which are privately owned. There are currently 12 air ambulance services, 11 of which are privately owned. The average salary of a medical director is \$50,000 annually for privately owned ambulance services. The EMS Bureau anticipates the ambulance services will have to increase the pay of these medical directors due to the additional responsibilities related to creating and managing the EMT-CP program. The EMS Bureau anticipates there to be a \$10,000 increase in pay annually for the medical directors of privately owned ambulance services which offer an EMT-CP program. The EMS Bureau anticipates one privately owned ambulance service to implement an EMT-CP program each year for the first five years.

$\$10,000 \times 1 \text{ year} = \$10,000.$

$\$10,000 \times 2 \text{ years} = \$20,000.$

$\$10,000 \times 3 \text{ years} = \$30,000.$

$\$10,000 \times 4 \text{ years} = \$40,000.$

$\$10,000 \times 5 \text{ years} = \$50,000.$

$\$10,000 + \$20,000 + \$30,000 + \$40,000 + \$50,000 = \$150,000$ annual increase in pay for medical directors of privately owned ambulance services for the first five year period.

The EMS Bureau anticipates one privately owned ambulance service to implement an EMT-CP program annually thereafter.

$\$10,000 \times 1$ privately owned ambulance service = \$10,000 increase in pay for medical directors for privately owned ambulance services which implement an EMT-CP program annually thereafter.

B. Salary for EMT-CP's.

The EMS Bureau currently has over 7,000 licensed EMT-Ps. The average annual salary for EMT-Ps is \$40,000. The Bureau of EMS anticipates an increase of \$5,000 during the first five year period in salary for EMT-Ps who begin working as an EMT-CP for privately owned ambulance services. The EMS Bureau anticipates 30 EMT-CPs will begin working as an EMT-CP for privately owned ambulance services during the first five year period.

$30 \times \$5,000 = \$150,000$ increase in cost for EMT-CPs who begin working as an EMT-CP for privately owned ambulance services during the first five year period.

The Bureau of EMS anticipates an increase of \$1,000 in salary for EMT-Ps who begin working as an EMT-CP for privately owned ambulance services annually thereafter. The EMS Bureau anticipates 5 EMT-CP's will begin working as an EMT-CP for privately owned ambulance services annually thereafter.

$5 \times \$1,000 = \$5,000$ increase in cost for EMT-CP's who start working as an EMT-CP for privately owned ambulance services annually thereafter.

Total for Privately Owned Ambulance Services.

\$150,000 (medical directors) + \$150,000 (salary for EMT-CP's) = \$300,000 for the first five year period.

\$10,000 (medical directors) + \$5,000 (salary for EMT-CP's) = \$15,000 annually thereafter.

(3) Privately owned EMS Training Entities.

A. Accreditation fees.

The EMS Bureau has 35 EMS training entities currently certified with the EMS Bureau, 10 of which are privately owned. The EMS Bureau anticipates five privately owned training entities will begin teaching the EMT-CP program. The EMT-CP program must be accredited by the Committee on Accreditation of Educational Programs for the Emergency Medical Services Professions (CoAEMSP). To become accredited by CoAEMSP, there is a \$1,200 submission application fee and approximately a \$2,750 fee for the site reviewers. In addition, there is an annual CoAEMSP accreditation fee of \$1,400. The EMS Bureau anticipates one privately owned EMS training entity will begin teaching the EMT-CP program annually for the first five year period.

\$1,200 submission application fee + \$2,750 fee for the site reviewers = \$3,950.

\$3,950 + (\$1400 annual fee X 5 years) = \$10,950

\$3,950 + (\$1,400 annual fee X 4 years) = \$9,550

\$3,950 + (\$1,400 annual fee X 3 years) = \$8,150

\$3,950 + (\$1,400 annual fee X 2 years) = \$6,750

\$3,950 + (\$1,400 annual fee X 1 year) = \$5,350

\$10,950 + \$9,550 + \$8,150 + \$6,750 + \$5,350 = \$40,750 for five privately owned EMS training entities which will begin teaching the EMT-CP program annually for the first five year period.

The EMS Bureau has 35 EMS training entities currently certified with the EMS Bureau, 15 of which are privately owned. The EMS Bureau anticipates one privately owned EMS training entity will begin teaching the EMT-CP program annually thereafter. The EMT-CP program must be accredited by the Committee on Accreditation of Educational Programs for the Emergency Medical Services Professions (CoAEMSP). In order to get accredited by CoAEMSP, there is a \$1,200 submission application fee and approximately a \$2,750 fee for the site reviewers. In addition, there is an annual CoAEMSP accreditation fee of \$1,400. The EMS Bureau anticipates one privately owned EMS training entity will begin teaching the EMT-CP program annually thereafter.

\$3,950 + \$1,400 = \$5,350 for one privately owned EMS training entity annually thereafter.

B. EMS training entity general costs for the EMT-CP program.

The EMS Bureau has 35 EMS training entities currently certified with the EMS Bureau, 10 of which are privately owned. The EMS Bureau anticipates one privately owned EMS training entity will begin teaching the EMT-CP program each year during the initial five year period. Average annual costs for personnel (medical director, program director, instructor and clinical coordinator) are approximately \$130,000. The EMS Bureau anticipates the medical director stipend to increase by \$500 annually for creating and implementing the new EMT-CP program. The EMS Bureau anticipates the program director's salary to increase by \$5,000 annually for the added responsibilities of the EMT-CP program. The EMS Bureau anticipates the instructor's salary to be \$15,000 and an added expense to the training entity as the instructor will most likely be a physician, physician assistant, or nurse practitioner instead of an EMT-P who will only teach the EMT-CP program. The EMS Bureau anticipates the clinical coordinator's salary to increase \$5,000 annually for the added responsibilities of the EMT-CP program. The EMS Bureau anticipates there to be \$500 increase in incidental expenses for teaching the EMT-CP program annually. Although the EMS Bureau is estimating costs to the privately owned EMS training entities; it should be noted that the EMS training entities will receive compensation from EMT-CP students who complete the program to offset these new costs.

\$500 additional expense for medical director annually + \$5,000 increase in program director's salary annually + \$15,000 EMT-CP instructor's salary annually + \$5,000 increase in salary for clinical coordinator annually + \$500 incidental expenses = \$26,000 for one privately owned EMS training entity.

\$26,000 X 5 years = \$130,000 for one privately owned ambulance service.

\$26,000 X 4 years = \$104,000 for one privately owned ambulance service.

\$26,000 X 3 years = \$78,000 for one privately owned ambulance service.

\$26,000 X 2 years = \$52,000 for one privately owned ambulance service.

\$26,000 X 1 year = \$26,000 for one privately owned ambulance service.

\$130,000 + \$104,000 + \$78,000 + \$52,000 + \$26,000 = \$390,000 for the first five year period.

\$500 additional expense for medical director annually + \$5,000 increase in program director's salary annually + \$15,000 EMT-CP instructor's salary annually + \$5,000 increase in salary for clinical coordinator annually + \$500 incidental expenses = \$26,000 for one privately owned EMS training entity = \$26,000 for one privately owned EMS training entity annually thereafter.

Total for Privately Owned EMS Training Entities.

\$40,750 (accreditation fees) + \$390,000 (EMS training entity costs) = \$430,750 for the first five year period.

\$5,350 (accreditation fees) + \$26,000 (EMS training entity costs) = \$31,350 annually thereafter.

IV. ASSUMPTIONS

The EMS Bureau determined there would be no additional costs to the private ambulance services for continuing education costs for EMT-CPs employed by these private ambulance services. The EMS Bureau has considered the continued education costs to be an expense of the EMT-CP.