

**FISCAL NOTE  
PUBLIC 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:**

<b>Rule Number and Title:</b>	<b>19 CSR 30-40.800</b>
<b>Type of Rulemaking:</b>	<b>Proposed Rule</b>

**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:
<b>EMS Bureau Department of Health and Senior Services</b>		<b>\$43,897.50 for the first five year period \$6,893.22 annually thereafter</b>
<b>Publicly Owned Ambulance Services</b>		<b>\$262,500 for the first five year period \$12,500 annually thereafter</b>
<b>Publicly Owned EMS Training Entities</b>		<b>\$430,750 for the first five year period \$31,350 annually thereafter</b>
<b>Total</b>		<b>\$737,147.50 for the first five year period \$50,743.22 annually thereafter</b>

**III. WORKSHEET**

(1) EMS Bureau.

A. Criminal Background Check.

The EMS Bureau will have to conduct a criminal background check for each applicant applying for an initial certification as an EMT-Community Paramedic (EMT-CP). An initial EMT-CP applicant must be licensed in the State of Missouri as an EMT-Paramedic (EMT-P) before they can apply for an EMT-CP certification. The EMS

Bureau currently has over 7,000 licensed EMT-Ps. It is anticipated that the EMS Bureau will receive 100 applications for EMT-CPs per year for the first five years.

If the applicant has been a Missouri resident for the last five years, then the EMS Bureau will conduct a criminal background search with the Missouri Highway Patrol. The EMS Bureau anticipates 66 of the 100 initial EMT-CP applicants will have lived in Missouri the entire five year period prior to the date on their application. The current cost for a Missouri Highway Patrol criminal background check is \$11 for each applicant.

$66 \times 5 \times \$11 = \$3,630$  for the first five year period.

If the applicant has not been a Missouri resident for the last five years, then the EMS Bureau will conduct a criminal background search with the Federal Bureau of Investigation (FBI). The EMS Bureau anticipates 34 of the initial 100 EMT-CP applicants will not have lived in Missouri the entire five year period prior to the date on their application. The current cost for a FBI criminal background check is \$36.50.

$34 \times 5 \times \$36.50 = \$6,205$  for the first five year period.

The EMS Bureau will have to conduct a criminal background check for each applicant applying for an initial certification as an EMT-CP annually thereafter the five year period. An initial EMT-CP applicant must be licensed in the State of Missouri as an EMT-Paramedic before they can apply for an EMT-CP certification.

The EMS Bureau currently has over 7,000 licensed EMT-Ps. It is anticipated that the EMS Bureau will receive 50 applications for EMT-CPs per year annually thereafter the initial five year period. If the applicant has been a Missouri resident for the last five years prior to the date of application, then the EMS Bureau will conduct a criminal background search with the Missouri Highway Patrol. The EMS Bureau anticipates 33 of the 50 initial EMT-CP applicants will have lived in Missouri the entire five year period prior to the date on their application. The current cost for a Missouri Highway Patrol criminal background check is \$11 for each applicant.

$33 \times \$11 = \$363$  annually thereafter.

If the applicant has not been a Missouri resident for the five years prior to the date of application, the EMS Bureau will conduct a criminal background search with the FBI. The EMS Bureau anticipates 17 of the initial 50 EMT-CP applicants will not have lived in Missouri the entire five year period prior to the date on their application. The current cost for a FBI criminal background check is \$36.50.

$17 \times \$36.50 = \$620.50$  annually thereafter.

There will be no new costs as a result of this rule for the EMS Bureau to conduct criminal background searches on EMT-CP applicants applying for recertification because an EMT-CP must also be licensed as an EMT-P and will apply for relicensure as an EMT-P at the same time. The EMS Bureau already conducts criminal background checks on all EMT-Ps who apply for relicensure.

B. EMS Bureau Staff Time.

### 1. Application processing.

It will take approximately thirty minutes for EMS Bureau staff to process an initial EMT-CP application. Processing an anticipated 100 EMT-CP applications per year for the first five years is expected to be 1/16 of the job responsibilities for one staff member per year. Average AOSA salaries are \$25,000. There will be no added processing costs for EMT-CP recertification since the application must accompany the EMT-P relicensure application.

$\$25,000 \times 1/16 \times 5 = \$7812.50$  for the first five years.

It will take approximately thirty minutes for EMS Bureau staff to process an initial EMT-CP application. Processing an anticipated 50 EMT-CP applications annually thereafter is expected to be 1/18 of the job responsibilities for secretarial staff per year. Average AOSA salaries are \$25,000. There will be no added processing costs for EMT-CP recertification since the application must accompany the EMT-P relicensure application.

$\$25,000 \times 1/18 \times 1 = \$1,388.89$  annually thereafter.

### 2. Inspector duties for initial EMT-CP applications.

It will take approximately four hours for inspectors to review an EMT-CP's initial application, validate the courses, determine if the courses meet regulation requirements and correspond back and forth with the applicant or training entity if there are any issues. Average inspector salaries are \$35,000 per year. The EMS Bureau anticipates processing an anticipated 100 EMT-CP applications per year for the first five years. It is anticipated that the time it will take for inspectors to review EMT-CP's initial applications per year for the first five years will be 1/10 of the inspector's job duties.

$\$35,000 \times 1/10 \times 5 = \$17,500$  for the first five years.

It will take approximately four hours for inspectors to review an EMT-CP's initial application, validate the courses, determine if the courses meet regulation requirements and correspond back and forth with the applicant or training entity if there are any issues. Average inspector salaries are \$35,000 per year. The EMS Bureau anticipates processing an anticipated 50 EMT-CP applications per year annually thereafter. It is anticipated that the time it will take for inspectors to review EMT-CP's initial applications per year for the first five years will be 1/15 of the inspector's job duties.

$\$35,000 \times 1/15 \times 1 = \$2,333.33$  annually thereafter.

### 3. Inspector duties for EMT-CP recertification applications.

It will take approximately two hours for inspectors to review an EMT-CP's recertification application, validate the continuing education, determine if the courses meet regulation requirements and correspond back and forth with the applicant or training entity if there are any issues. Average inspector salaries are \$35,000 per year. It is anticipated that the time it will take for inspectors to review an EMT-CP's recertification application will be 1/20 of the inspector's job duties. The EMS Bureau does not anticipate many relicensure

applications during the first five years since people will just begin getting certified as an EMT-CP.

$\$35,000 \times 1/20 \times 5 = \$8,750$  for the first five year period.

It will take approximately two hours for inspectors to review an EMT-CP's recertification application, validate the continuing education, determine if the courses meet regulation requirements and correspond back and forth with the applicant or training entity if there are any issues. Average inspector salaries are \$35,000 per year. It is anticipated that the time it will take for inspectors to review an EMT-CP's recertification application will be 1/16 of the inspector's job duties.

$\$35,000 \times 1/16 \times 1 = \$2187.50$  annually thereafter.

Total for EMS Bureau.

$\$6,205$  (criminal background check outside of Missouri) +  $\$3,630$  (inside of Missouri) +  $\$7,812.50$  (AOSA duties) +  $\$17,500$  (inspector duties initial application review) +  $\$8,750$  (inspector duties recertification application review) =  $\$43,897.50$  for the first five years.

$\$620.50$  (criminal background check outside of Missouri) +  $\$363$  (inside of Missouri) +  $\$1,388.89$  (AOSA duties) +  $\$2,333.33$  (inspector duties initial application review) +  $\$2,187.50$  (inspector duties recertification application review) =  $\$6,893.22$  annually thereafter.

(2) Publicly owned Ambulance Services.

A. Medical Directors.

There are currently 217 ground ambulance services, 195 of which are publicly owned. There are currently 12 air ambulance services, only one of which is publicly owned. The average salary of medical directors is \$40,000 annually for publicly 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 \$7,500 annual increase in pay for the medical directors of publicly owned ambulance services which offer an EMT-CP program. The EMS Bureau anticipates one publicly owned ambulance service to implement an EMT-CP program each year for the first five years.

$\$7,500$  annual increase in pay for medical directors X one publicly owned ambulance service X five years =  $\$37,500$ .

$\$7,500$  annual increase in pay for medical directors X one publicly owned ambulance service X four years =  $\$30,000$ .

$\$7,500$  annual increase in pay for medical directors X one publicly owned ambulance service X three years =  $\$22,500$ .

\$7,500 annual increase in pay for medical directors X one publicly owned ambulance service X two years = \$15,000

\$7,500 annual increase in pay for medical directors X one publicly owned ambulance service X one year = \$7,500

$\$37,500 + \$30,000 + \$22,500 + \$15,000 + \$7,500 = \$112,500$  increase in pay for medical directors for the first five year period.

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\$7,500 increase in pay for medical directors X one publicly owned ambulance service annually thereafter = \$7,500 increase in annual pay for medical directors for public 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 salary for EMT-Ps is \$40,000. The EMS Bureau anticipates an annual increase of \$1,000 in salaries for EMT-Ps who begin working as an EMT-CP for publicly owned ambulance services. The EMS Bureau anticipates 30 EMT-CPs will begin working as an EMT-CP for publicly owned ambulance services during the first five year period.

30 EMT-CPs during the first five year period X \$1,000 X 5 years = \$150,000 increase in cost for EMT-CPs who begin working as an EMT-CP for publicly owned ambulance services during the first five year period.

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5 EMT-CPs during the first five year period X \$1,000 = \$5,000 increase in cost for EMT-CP's who start working as an EMT-CP for publicly owned ambulance services annually thereafter.

#### Total for Publicly Owned Ambulance Services.

\$112,500 (medical directors) + \$150,000 (salary for EMT-CP's) = \$262,500 for the first five year period.

\$7,500 (medical directors) + \$5,000 (salary for EMT-CP's) = \$12,500 annually thereafter.

(3) Publicly owned EMS Training Entities.

A. Accreditation fees.

The EMS Bureau has 35 EMS training entities currently certified with the EMS Bureau, 15 of which are publicly owned. The EMS Bureau anticipates five publicly 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). The cost to be accredited by CoAEMSP is \$1,400 per year for the annual fee. 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. The EMS Bureau anticipates one public training entity will begin teaching the EMT-CP program annually for the next five year period

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

$\$3,950 + (\$1400 \text{ annual fee} \times 5 \text{ years}) = \$10,950$

$\$3,950 + (\$1,400 \text{ annual fee} \times 4 \text{ years}) = \$9,550$

$\$3,950 + (\$1,400 \text{ annual fee} \times 3 \text{ years}) = \$8,150$

$\$3,950 + (\$1,400 \text{ annual fee} \times 2 \text{ years}) = \$6,750$

$\$3,950 + (\$1,400 \text{ annual fee} \times 1 \text{ year}) = \$5,350$

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

The EMS Bureau has 35 EMS training entities currently certified with the EMS Bureau, 15 of which are publicly owned. The EMS Bureau anticipates one publicly 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). The cost to be accredited by CoAEMSP is \$1,400 per year for the annual fee. 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. The EMS Bureau anticipates one public training entity will begin teaching the EMT-CP program annually for the next five year period

$\$3,950 + (\$1,400 \text{ annual fee} \times 1 \text{ year}) = \$5,350$

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, 15 of which are publicly owned. The EMS Bureau anticipates five publicly owned EMS training entities will begin teaching the EMT-CP program during the next five year period. Average annual costs for EMT-Paramedic training entity 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 like be a physician, physician assistant, or nurse practitioner instead of an EMT-Paramedic who will only teach the EMT-CP program. The EMS Bureau anticipates the clinical coordinator's salary to increase \$5,000 annually for added responsibilities of the EMT-CP program. The EMS Bureau anticipates there to be a \$500 annual increase in incidental expenses for teaching the EMT-CP program. Although the EMS Bureau is estimating costs to the publicly 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 annually = \$26,000 for one publicly owned EMS training entity.

\$26,000 X 5 years X one publicly owned ambulance service = \$130,000  
\$26,000 X 4 years X one publicly owned ambulance service = \$104,000  
\$26,000 X 3 years X one publicly owned ambulance service = \$78,000  
\$26,000 X 2 years X one publicly owned ambulance service = \$52,000  
\$26,000 X 1 year X one publicly owned ambulance service = \$26,000

\$130,000 + \$104,000 + \$78,000 + \$52,000 + \$26,000 = \$390,000 for the next 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 annually = \$26,000 for one publicly owned EMS training entity X one publicly owned EMS training entity annually thereafter = \$26,000 for one publicly owned EMS training entity annual thereafter.

Total for Public 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 public ambulance services for continuing education costs for EMT-CPs employed by these public ambulance services. The EMS Bureau has considered the continued education costs to be an expense of the EMT-CP.

