

Corpening, Taylor

From: Kenneth Bryan Vaught <vaughtk@surry.edu>
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To: Rulescoordinator, Dhsr
Subject: [External] Proposed EMS Rules Changes Comment

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Good morning, Mrs. Nadine Pfeiffer,

As program coordinator for the Surry Community College Emergency Medical Program, I reviewed the proposed rule changes, in particular those that affect students entering our EMS courses.

To provide a background of our program and the reason for our comments, questions, and concerns: Surry Community College (SCC), as well as other colleges on the state borders, also serves healthcare professionals and those entering the healthcare profession outside North Carolina. At SCC, we draw several students from southwestern Virginia, at times, over 25% of our classes are Virginia residents. As a national registry state, Virginia residents obtain their state credentials by taking the national registry test; as an accredited program, SCC creates this opportunity for Virginia students. Some of these Virginia resident students are taking our courses because of our proximity to them (less than 7 miles from the state line) and plan to work in Virginia. Past students have also taken our courses from as far as Radford/Blacksburg, Virginia because our course costs for paramedic and EMT are far less than Virginia courses. Several of these Virginia students return to work in NC because they enjoyed the agencies and clinical sites they worked in as students which in turn feeds employees to these North Carolina agencies.

Our comment questions the proposed change to 10A NCAC 13P .0502 INITIAL CREDENTIALING REQUIREMENTS FOR EMR, EMT, AEMT, PARAMEDIC, AND EMD

Specifically, (a) (5) which as proposed reads, "Individuals applying to OEMS for legal recognition, who completed initial educational courses through an OEMS approved North Carolina educational institution, shall complete a written examination administered by the OEMS."

We understand this proposed rule is an attempt to close a loophole students use to circumvent more than three attempts at a credentialing exam; i.e. a student unable to pass the state exam in three attempts, takes and passes the national registry exam, then reciprocity the national credential to an NC credential. Our program is amenable to the concept that students should be able to pass an exam within only 3 attempts. We also highly recommend and encourage all our students (especially non-residents of NC) to take both state and national exams so they can work anywhere in NC or across the United States.

However, in our student's cases, and those of other border state colleges, this proposal may create some issues.

1. A comment in looking at this rule as a non-NC residential student: It is difficult to understand why NC would accept, without question, reciprocity of a national registry credential from a non-NC resident who took their course in a neighboring state, but of a student who learned NC protocols, rules, and procedures will be required to take the state exam. This carries the appearance of being punitive to NC students who are not NC residents and will be difficult to clarify without saying "because the rules say so" for these students who have to pay 2 exam fees. However, as I stated, SCC encourages students to take the NC exam and national registry exam regardless of their resident state.
2. How will this rule list above work in relation to the current rule (4) which states, "Within 90 days from their course graded date as reflected in the OEMS credentialing database, complete a written examination administered by the OEMS?" Here will be our issues:
 - If a non-NC resident takes an SCC EMT, AEMT, or Paramedic course, without initial intentions of working in NC, but 4 months later, wants to obtain a job in a NC EMS agency will be outside their 90-day

requirement. I could agree that within 6 months, we could abide by the second part of rule (4) which follows with “If the applicant fails to register and 18 complete a written examination within the 90-day period, the applicant shall obtain a letter of authorization to continue eligibility for testing from his or her EMS Educational Institution's program coordinator to qualify for an extension of the 90-day requirement set forth in this Paragraph.”

- However, what of these non-NC resident students who decide a year later to work in NC and need to obtain their NC credentials? These former students are outside the 6 months for 3 attempts as required in (a) (4).

Options to consider:

The rule could add verbiage to provide a time limit on rule (5), such as “Individuals applying to OEMS for legal recognition, who completed initial educational courses through an OEMS approved North Carolina educational institution within the past year,” A year delay would deter using reciprocity to circumvent the three failed attempts at the state exam. If no time limit is implemented or a time limit greater than a year is implemented, then rule (4) will need to be amended to allow program coordinators to send a letter for students to be able to sit for the exam after the 6-month term listed in rule (4). Otherwise, we will have healthcare providers who will never be able to obtain their NC credential without sitting through an entire course again. For those Paramedics, they will not go through another year or more just to work in NC. Many AEMTs and EMTs will not do another 4-6 months for their NC credential either.

Alternatively, it could be worded so it is not applicable to non-NC residents who have made no attempts at the NC state exam and are seeking reciprocity to work for a NC agency or facility.

Another option could be the requirement of all seeking reciprocity must take the NC state exam. This option would have to account for instances where someone is using national registry reciprocity to get 3 additional attempts at the state exam.

I concede looking at this rule for the state as a whole, these instances seem as few in numbers, but for the border counties and colleges of NC it will be significantly larger percentages. At SCC, our EMS courses are already seeing a return of students from across the state line, and as the grant funds Virginia and North Carolina have received over the past 3 years dissipate, these numbers for SCC will continue to increase. Without an adjustment to rule (a) (5) and/or (a) (4), this will drive away non-resident students and non-resident employees from both bordering EMS agencies and college programs who help to feed the NC EMS healthcare field with students who become great non-resident employees.

Regards,

Kenneth Vaught, BHA

Program Coordinator

“Dedicated to the Future of EMS”



1220 State Street, Mount Airy, NC 27030

Phone: 336-386-3633



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