



Dedicated to protecting and improving the health and environment of the people of Colorado

To: Members of the State Board of Health

From: Marschall Smith, Professional Standards Section Manager,  
Health Facilities & Emergency Medical Services Division

Through: D. Randy Kuykendall, Division Director, *D.R.K.*  
Health Facilities & Emergency Medical Services Division

Date: September 16, 2015

Subject: Request for Rulemaking Hearing  
Proposed Amendments to 6 CCR 1015-3, Chapter One, Rules Pertaining to EMS  
Education and Certification with a request for the rulemaking hearing to occur  
in November of 2015

---

The department is proposing an amendment to 6 CCR 1015-3, Chapter One, Section 5. The proposed amendments are necessary to bring the requirements of Emergency Medical Services Provider Initial Certification for military members and their spouses in line with House Bill 15-1015. House Bill 15-1015 amended C.R.S. Section 25-3.5-203(1)(d)(III) to include veterans, members of the national guard and reserves separating from an active duty tour, and their spouses. The changes to Chapter One by the Board of Health are required to put this expansion in place.

House Bill 15-1015 ratifies the Recognition of Emergency Medical Services Personnel Licensure Interstate Compact (“REPLICA”). Once ten states have ratified REPLICA, the compact will allow emergency medical services (“EMS”) providers to work across compact states, in specific circumstances, without seeking certification in multiple states. REPLICA also allows for active duty military members and veterans as well as members of the national guard and reserves separating from an active duty tour to obtain expedited state certification as long as they are certified by NREMT. Furthermore, spouses of any of these individuals may also obtain expedited state certification as long as they are certified by the National Registry of Emergency Medical Technicians (NREMT).

Future changes to Chapter One may be necessary once REPLICA is fully in place.

STATEMENT OF BASIS AND PURPOSE  
AND SPECIFIC STATUTORY AUTHORITY  
for Amendments to  
6 CCR 1015-3, Chapter One, Rules Pertaining to EMS Education and Certification

**Basis and Purpose.**

House Bill 15-1015, signed by Gov. John Hickenlooper on May 8, 2015 and effective as of August 5, 2015, modifies C.R.S. Section 25-3.5-203(1)(d)(III) to include veterans, members of the national guard and reserves separating from an active duty tour, and the spouses of such members and veterans. The rules governing the certification of emergency medical services (“EMS”) providers can be found at 6 CCR 1015-3, Chapter One.

The revisions in Chapter One will allow for active duty military members, veterans, members of the national guard and reserves separating from an active duty tour, and the spouses of such members and veterans to obtain state certification in an expedited fashion as long as they are certified by the National Registry of Emergency Medical Technicians (“NREMT”). Currently, Chapter One, Section 5 only lists active duty military members and their spouses, and requires a current certification from another state.

**Specific Statutory Authority.**

C.R.S. Section 25-3.5-203

---

SUPPLEMENTAL QUESTIONS

Is this rulemaking due to a change in state statute?

Yes, the bill number is HB 15-1015; rules are \_\_\_ authorized  required.

No

Is this rulemaking due to a federal statutory or regulatory change?

Yes

No

Does this rule incorporate materials by reference?

Yes

No

Does this rule create or modify fines or fees?

Yes

No

**REGULATORY ANALYSIS**  
for Amendments to  
6 CCR 1015-3, Chapter One, Rules Pertaining to EMS Education and Certification

1. A description of the classes of persons who will be affected by the proposed rule, including classes that will bear the costs of the proposed rule and classes that will benefit from the proposed rule.

The proposed amendments would expand the recognition of military exceptions of initial certification requirements to include veterans, members of the national guard and reserves separating from an active duty tour, and spouses of such members and veterans. No costs are associated with this rule change.

2. To the extent practicable, a description of the probable quantitative and qualitative impact of the proposed rule, economic or otherwise, upon affected classes of persons.

In the past, few EMS provider applicants have utilized the military status provisions in the rules, as the majority of military personnel maintain NREMT certification as a duty requirement. The result is that many of the military personnel who are initial applicants follow the department's traditional initial application process. However, the military status provisions have been more useful to the spouses of the military personnel, who may not hold a current NREMT certification but are certified by another state. For individuals who wish to take advantage of the proposed military status provisions and do not currently have NREMT certification, obtaining the NREMT certification can cost up to \$100 for the initial certification.

3. The probable costs to the agency and to any other agency of the implementation and enforcement of the proposed rule and any anticipated effect on state revenues.

The department will incur no extra cost to process initial applicants requesting recognition of their military status.

4. A comparison of the probable costs and benefits of the proposed rule to the probable costs and benefits of inaction.

The rule change is necessary to align with House Bill 15-1015.

5. A determination of whether there are less costly methods or less intrusive methods for achieving the purpose of the proposed rule.

The determination is that there is no less costly or less intrusive method for achieving the purpose of the rule.

6. Alternative Rules or Alternatives to Rulemaking Considered and Why Rejected.

The language of the proposed language matches the language changes that were made to C.R.S. Section 25-3.5-203 by House Bill 15-1015.

7. To the extent practicable, a quantification of the data used in the analysis; the analysis must take into account both short-term and long-term consequences.

House Bill 15-1015 ratifies the Recognition of Emergency Medical Services Personnel Licensure Interstate Compact (“REPLICA”). Once ten states have ratified REPLICA, the compact will allow emergency medical services (“EMS”) providers to work across compact states, in specific circumstances, without seeking certification in multiple states. REPLICA also allows for active duty military members and veterans as well as members of the national guard and reserves separating from an active duty tour to obtain expedited state certification as long as they are certified by NREMT. Furthermore, spouses of these individuals may also obtain expedited state certification as long as they are certified by NREMT. Because few applicants previously took advantage of the military provisions, the department believes that only a small number of applicants will make use of the new military provision, instead choosing the traditional initial application process.

**STAKEHOLDER COMMENTS**  
for Amendments to  
**6 CCR 1015-3, Chapter One, Rules Pertaining to EMS Education and Certification**

The following individuals and/or entities were included in the development of these proposed rules:

House Bill 15-1015 was sponsored by Representative Faith Winter (D) and Representative John Cooke (R). On January 27, 2015, several members of the EMS community attended the hearing at the House Committee on Public Health Care & Human Services and testified in favor of REPLICA. The State Emergency Medical and Trauma Services Advisory Council (“SEMTAC”) and the Emergency Medical Practice Advisory Council (“EMPAC”) have been kept informed of REPLICA and the necessary rule changes to Chapter One.

This change is necessary to bring Chapter One, Section 5 into alignment with House Bill 15-1015.

The following individuals and/or entities were notified that this rule-making was proposed for consideration by the Board of Health:

SEMTAC was notified of the proposal on July 30, 2015.  
EMPAC was notified of the proposal on August 10, 2015.

Notice will be provided to the EMS community prior to the September 16, 2015 Board of Health meeting through a weekly newsletter, the EMTS ON THE GO.

Summarize Major Factual and Policy Issues Encountered and the Stakeholder Feedback Received. If there is a lack of consensus regarding the proposed rule, please also identify the Department’s efforts to address stakeholder feedback or why the Department was unable to accommodate the request.

The department expects this proposed rule to be supported by the stakeholders.

Please identify health equity and environmental justice (HEEJ) impacts. Does this proposal impact Coloradoans equally or equitably? Does this proposal provide an opportunity to advance HEEJ? Are there other factors that influenced these rules?

The proposed rule change expands the recognition of military status to veterans, members of the national guard and reserves separating from an active duty tour, and the spouses of such individuals to obtain expedited state certification as long as they are certified by the National Registry of Emergency Medical Technicians. There will be no impact on health equity and environmental justice.

DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT

Health Facilities and Emergency Medical Services Division

Emergency Medical Services

6 CCR 1015-3

.....

CHAPTER ONE – RULES PERTAINING TO EMS EDUCATION AND CERTIFICATION

\*\*\*

Section 5 - Emergency Medical Services Provider Certification

\*\*\*

5.2 Initial Certification

\*\*\*

5.2.2 Applicants for initial certification shall submit to the Department a completed application provided by the Department, including the applicant’s signature in a form and manner as determined by the Department, that contains the following:

\*\*\*

B) ~~evidence~~ Evidence of current and valid certification from the NREMT at or above the EMS Provider level being applied for, ~~except as provided for in Paragraph F below.~~

\*\*\*

C) ~~evidence~~ Evidence of current and valid professional level Basic Cardiac Life Support (CPR) course completion from a national or local organization approved by the Department, except as provided for in Paragraph F-G below.

D) In addition to paragraph C, above, EMT-I and Paramedic applicants shall submit evidence of current and valid Advanced Cardiac Life Support (ACLS) course completion from a national or local organization approved by the Department, except as provided in Paragraph F-G below.

\*\*\*

G) ~~While stationed or residing within Colorado, an individual serving in the armed services of the United States or the spouse of the individual may apply for certification to practice in Colorado. The individual or spouse is exempt from the requirements of paragraphs B, C, and D if the applicant provides evidence of a valid EMS provider certificate or license to provide emergency medical services from another state, district or Territory, the certificate or license is current, and the person is in good standing. While stationed or residing within Colorado, all veterans, active military service members, and members of the national guard and reserves that are separating from an active duty tour, or the spouse of a veteran or a member, may apply for certification to practice in Colorado. The veteran, member, or spouse is exempt from the requirements of paragraphs C and D.~~

\*\*\*