

# Written Testimony Regarding HFS 111

The Wisconsin EMS Association wishes to go on record regarding the following items contained in the proposed changes for HFS 111

**111.04 (2) b** Under the proposed rules an individual who fails the EMT-Intermediate examination may be reexamined one time before being required to obtain refresher training. This is not consistent with the National Registry of Emergency Medical Technicians (NREMT), the entity providing the test. Their requirements state "*Candidates are allowed three opportunities to pass the written examination provided all other requirements for National Registration are met.*" **HFS 111 should be changed to be consistent with NREMT and allow a total of three examinations prior to requiring refresher training.**

**111.04 (4) (b) 1** Manual defibrillation is not listed as one of the authorized actions of EMTs-Intermediate, even though this skill will be taught and is required for practice in Advanced Cardiac Life Support. All other EMS providers (other than paramedic or EMT-DM) use semi-automatic defibrillators to accomplish defibrillation. EMT-Intermediate providers will now be required to read and interpret the ECG and make a shock determination – much like that of EMT-DM providers. They will also be required to use alternate energy levels for pediatric patients. **HFS 111 should be changed to include manual defibrillation as an authorized action.**

**111.045 (1)** There are currently over 100 providers in Wisconsin who have been trained, tested and are currently practicing at the new EMT-Intermediate level scope of practice. This was accomplished through a pilot program termed Enhanced Intermediate. It has been verbally stated that these providers will be granted EMT-Intermediate licenses without additional training or testing. **HFS 111 should be changed to include language that provides current Enhanced Intermediates with an EMT-Intermediate license.**

**111.045 (3) (a)** Under the proposed rules current EMT-Intermediates will be required to complete a bridge course to obtain a new EMT-Intermediate license. The rules as proposed do not specify an hour requirement for this course, they only state that a department-approved course is required. **HFS 111 should be changed to include language that specifies the transition course hours to be a total of 250 divided between 175 didactic and 75 in the clinical or patient care setting. These hours are consistent with recommendations of the EMT-Intermediate curriculum committee.**

**111.05 (4) (b)** The proposed rules state that a training permit in force for 36 months shall expire regardless of the individual's enrollment in an EMT-Intermediate training course and may not be further extended or renewed. This would seem to prohibit the student from starting training from scratch in a new training course and obtaining a new permit. **HFS 111 should be changed to include the following additional language: "unless the student has enrolled in a new training course for EMTs-Intermediate."**

**111.06 (2) 5** Throughout the proposed rules, the wording "American Heart Association, American Red Cross or an equivalent organization recognized and approved by the department" is used with regard to BLS, ALS and ACLS training. In this section, only American Heart Association is used. While at the present time the AHA may

be the only instructor ACLS certification available, we cannot guarantee that other ACLS instructor courses will not become available in the future. **HFS 111 should be changed to include language that requires "or an equivalent organization recognized and approved by the department" in this section and anywhere else similar certification is required.**

**111.06 (4) (d)** The proposed hours for training an EMT-Basic to be allowed to take the exam to become an EMT-Intermediate is set at 350. The EMT-Intermediate curriculum committee has recommended the course hours be set at 335. **HFS 111 should be changed to reflect the recommendation of the EMT-Intermediate curriculum committee with the course hours set at 335.**