

**DIVISION OF PUBLIC & BEHAVIORAL HEALTH**  
**Bureau of Health Protection and Preparedness**  
**Emergency Medical Systems Program**  
**LCB File No. R102-18**

**Informational Statement per NRS 233B.066**

1. A clear and concise explanation of the need for the adopted regulation;

The Division of Public and Behavioral Health (Division) determined that existing Nevada Administrative Code (NAC) 450B needed to be reviewed with regulation additions and changes proposed. This amendment addresses expanding community paramedicine services, expanding the time in which an EMS provider must be found physically and mentally able to perform duties and expanding transporting time for trauma patients to trauma centers.

**Expanding Community Paramedicine Services:**

Existing regulations authorize the Division of Public and Behavioral Health (Division) to issue a service community paramedicine endorsement to permitted EMS agencies. However, many EMS agencies in rural Nevada rely on volunteer staff to meet demands of responding to 911 medical calls and do not have the available resources to provide the additional training required for EMS providers to obtain a community paramedicine endorsement. The purpose of this amendment is to expand the availability of these services by allowing a service community paramedicine endorsement to be issued to hospitals licensed by the Division pursuant to Nevada Revised Statute (NRS) 449.

**Expanding EMS Providers Physical and Mental Capability for Performance Requirements:**

Existing regulation requires EMS providers to be found physically and mentally capable of performing duties within 6 months prior to applying for a license. This amendment proposes to expand the requirement to 12 months prior to license application to be consistent with National Fire Protection Association guidelines.

**Expanding Transporting Trauma Patient Time:**

Existing regulation prescribes criteria for transporting patients with injury to a trauma center and the time in which the transport must occur. This amendment proposes to adopt by reference the criteria in the "Guidelines for Field Triage of Injured Patients," published by the Centers for Disease Control and Prevention (CDC). Existing regulation further requires if a patient with an injury cannot be transported to a trauma center within 30 minutes, the patient is to be transported to the nearest hospital. Patients meeting trauma center criteria transported to a hospital without a trauma center are then transferred to a trauma center causing a delay in appropriate care. This amendment proposes to expand the 30 minutes to 2 hours to prevent the unnecessary transfer of a patient from a hospital to a trauma center.

2. A description of how public comment was solicited, a summary of public response, and an explanation how other interested persons may obtain a copy of the summary;

One Public Workshop was held on August 7, 2018, at the following locations:

- Division of Public and Behavioral Health, 4150 Technology Way Room 303, Carson City, NV 89706
- Division of Public and Behavioral Health, 1020 Ruby Vista, Ste 103, Elko, Nv 89801
- Radiation Control Program, 2080 E. Flamingo Rd Ste. 319, Las Vegas, NV 89119

No participants were present at the Elko or Las Vegas locations.

Ten people provided comment in Carson City, all in support of the proposed changes:

- Five people commented on the positive effects of hospitals providing community paramedicine services, particularly in rural communities.
- Four people commented the changes to the trauma center destination would benefit patients with trauma.
- One comment was specifically in support of the expanded time for providers to meet the physical and mental criteria for an Emergency Medical Services (EMS) provider license.

The summary of public comments is within the Memorandum to the Board of Health and can be viewed with the link to the 09/07/18 Board of Health meeting, Regulations LCB file No. R102-18, on the Board of Health website at the following link:

[http://dpbh.nv.gov/Boards/BOH/Meetings/2018/2018\\_Board\\_of\\_Health\\_Meetings/](http://dpbh.nv.gov/Boards/BOH/Meetings/2018/2018_Board_of_Health_Meetings/)

The summary may also be obtained by contacting the Emergency Medical Systems Program, 4150 Technology Way Ste 101, Carson City, NV 89706. Phone: 775-687-7590

3. A statement indicating the number of persons who attended each meeting or workshop, testified at each hearing, and submitted written statements regarding the proposed regulation. This statement should include for each person identified pursuant to this section that testified at each hearing and/or submitted written statements regarding the proposed regulation, the following information, if provided to the agency conducting the hearing or workshop:
- (a) Name
  - (b) Telephone Number
  - (c) Business Address
  - (d) Business telephone number
  - (e) Electronic mail address; and
  - (f) Name of entity or organization represented

Three letters in support of the proposed regulations were received from:

- Assemblyman James Oscarson, District No. 36, PO Box 1600, Pahrump, NV 89041, [JamesOscarson@asm.state.nv.us](mailto:JamesOscarson@asm.state.nv.us)

- Senator Joyce Woodhouse [Joyce.Woodhouse@sen.state.nv.us](mailto:Joyce.Woodhouse@sen.state.nv.us) 702-896-1453
- Chief Chris Lawrence, Mineral County Fire Department & EMS, 418 Mineral Way, Hawthorne, NV 89415 775-945-2497

August 7, 2018, Public Workshop:

Seventeen people were noted on the Carson City location sign-in sheets, one person noted on the Elko location sign-in sheet, and six teleconference participants were noted as having attended the August 7, 2018, public workshop. There were no participants at the Las Vegas, Nevada meeting location. The sign-in sheets have been attached.

Ten of the attendees testified at the public workshop in support of all proposed regulations:

Joan Hall	Nevada Rural Hospital Partners	775-827-4770
Fergus Laughridge	Humboldt General Hospital Ambulance	775-623-5222
Rod Gamble	William Bee Ririe Hospital	775-238-0911
Marc Pinkas	Nevada National Security Site Fire & Rescue Ambulance Service	702-667-4008
Temple Fletcher	Care Flight	775-970-3576
Dennis Nolan	Reno Fire Department	775-334-2300
Dr. John Fildes	University of Nevada, Las Vegas	<i>none provided</i>
Hugh Qualls	Mount Grant General Hospital	775-945-2461
Louis Mendiola	Regional Emergency Medical Services Authority	775-625-0084
Dave Fogerson	East Fork Fire Protection District	775-782-9040

September 7, 2018, Board of Health meeting:

Nineteen people were noted on the Carson City location sign-in sheet as having attended the September 7, 2018, Board of Health meeting. A sign-in sheet was not used at the Las Vegas location because there was no public present. However, there were five people noted to be at the Las Vegas location including four board members: Jon Pennell, Dipti Shah, Monice Ponce, and Tom Smith, as well as, Senior Deputy Attorney General, Linda Anderson. The sign-in sheet has been attached.

One of the attendees testified at the Board of Health meeting in support of all proposed regulations:

Tina Smith	Emergency Medical Systems	775-687-7597
------------	---------------------------	--------------

4. A description of how comment was solicited (i.e., notices) from affected businesses, a summary of their response, and an explanation how other interested persons may obtain a copy of the summary.

Pursuant to NRS 233B.0608 (2) (a), the Division requested input from currently permitted Emergency Medical Services (EMS) agencies. These agencies and Nevada Rural Hospital Partners were sent the proposed regulations and the small business impact questionnaire.



The Emergency Medical Systems Program posted the proposed regulation changes and the small business impact questionnaire to the EMS/Division website.

The questions on the Small Business Impact Questionnaire (SBIQ) were:

- 1) How many employees are currently employed by your business?
- 2) Will a specific regulation have an adverse economic effect upon your business? If so, please indicate the estimated dollar amount(s) you believe the adopted regulations will cost you over one calendar year with a brief explanation as to how the dollar amount was calculated.
- 3) Will the regulation(s) have any beneficial effect upon your business? If so, please include any cost savings you believe the adopted regulations will save you over one calendar year with an estimated dollar amount if applicable.
- 4) Do you anticipate any indirect adverse effects upon your business?
- 5) Do you anticipate any indirect beneficial effects upon your business?

Responses to the questionnaire:

Twelve business entities responded to the small business impact questionnaire. Eleven responses anticipate beneficial effects on their business. One response anticipated adverse effects on their business. The result of the small business impact questionnaire revealed mostly positive data for analysis.

- One EMS agency responded “yes” to a potential adverse effect asking how the 2-hour transport time to a trauma center would be determined. The agency was contacted and explained the EMS providers on the scene of the injury would determine the transport time. This explanation resolved their concerns with the proposed amendment.
- One EMS agency commented transporting patients to the current facility will benefit trauma patients.
- Rural hospitals responded positive to beneficial effects: unnecessary 911 calls and emergency room visits will be reduced; better care will drive more business as patients have a more positive experience; emergency room volumes and the associated excessive costs could be reduced.

The Division of Public and Behavioral Health Emergency Medical Systems Program has determined that the proposed amendments should not impose an economic burden upon a small business or prevent the formation, operation or expansion of a small businesses in Nevada.

A copy of the small business impact statement/summary can be obtained by contacting the Division of Public and Behavioral Health Emergency Medical Systems Program, 4150 Technology Way, Ste 101, Carson City, NV 89706. Phone: 775-687-7590, or by following this link: <http://dpbh.nv.gov/Reg/EMS/EMS-home/>

5. If, after consideration of public comment, the regulation was adopted without changing any part of the proposed regulation, a summary of the reasons for adopting the regulation without change. The statement should also explain the reasons for making any changes to the regulation as proposed.

No changes were necessary for these regulations.

6. The estimated economic effect of the regulation on the businesses which it is to regulate and on the public. These must be stated separately, and in each case must include:
  - (a) Both adverse and beneficial effects; and
  - (b) Both immediate and long-term effects.

There are no anticipated adverse economic effects on businesses which NAC 450B regulates or the public. The beneficial economic effect is anticipated to decrease the amount of unnecessary 911 calls and emergency department visits, which will in turn reduce the excessive costs incurred. These are both immediate and long-term benefits to businesses.

7. The estimated cost to the agency for enforcement of the proposed regulation.

There is no cost to the Division anticipated for enforcement of the proposed regulations.

8. A description of any regulations of other state or government agencies which the proposed regulation overlaps or duplicates and a statement explaining why the duplication or overlapping is necessary. If the regulation overlaps or duplicates a federal regulation, name the regulating federal agency.

There are no other state or government agency regulations that overlap or duplicate the proposed regulations.

9. If the regulation includes provisions which are more stringent than a federal regulation which regulates the same activity, a summary of such provisions;

There are no federal regulations that regulate the proposed regulations.

10. If the regulation establishes a new fee or increases an existing fee, a statement indicating the total annual amount the agency expects to collect and the manner in which the money will be used.

There are no new fees or increases to existing fees in the proposed regulations.

**NOTE: The Informational statement is essential. If this statement is not included with the final regulations or is incomplete or inaccurate, LCB will return the regulation to the agency. Unless a statement is supplied, the LCB will not submit the regulation to the Legislative Commission, and the regulation never becomes effective (NRS 233B.0665).**

# Nevada State Board of Health

DATE: September 7, 2018

## Videoconference

LOCATION: Division of Public and Behavioral Health  
4150 Technology Way, Ste. 303  
Carson City, NV

**\*PLEASE PRINT CLEARLY\***

NAME	REPRESENTING	TELEPHONE #
JOAN HALL	NRHP	827-4770
Keith Shellhamer	Carson City Holding L.L.C	721-7592
Charlie Mann	Mt Grant Gen Hospital	775-945-2461
Barrett Evans	DPBH - EHS	775-687-7539
Karen Beckley	DPBH - BHPP	775-687-7540
Tiffany Lewis	DPBH Admin	684-5952
Tammy Bitter	DPBH - CHS	684-5031
Nicole Batten	DPBH - CHS	684-5022
Nicki Aaker	CCMHS	283-7704
Toni Orr	CCMHS	775 230-3504
Tina Smith	DPBH - EMS	775-687-7597
Jenna Burton	DPBH - EMS	775-687-7598
Tina Gerber-Winn	DPBH - Rural Clinics	775 684 5013
Judith A. Bittner	Board of Health	775 453-9634
Jason Lewis	DPBH	775 684-4162
Mike Bologlu	EMS	687-7574
Richard Feltner	EMS	687-7592
Donald Watson	EMS	687-7598
Blayne Osborn	NRHP	827-4770



Public Workshop on Emergency Medical Services

Division of Public and Behavioral Health, 4150 Technology Way, Room 301, Carson City, NV, 89706

Radiation Control Program, 2080 E. Flamingo Rd, Ste 319, Las Vegas, NV, 89119

Division of Public and Behavioral Health, 1020 Ruby Vista, Ste 103, Elko, NV 89801

August 7, 2018 at 11:30 a.m.

SIGN-IN SHEET

Name (print)	Email Address	Phone Number
Guillermo Fenzon ✓	gfenzon@health-nv.gov	775-687-7592
Jenna Burton ✓	jburt@health-nv.gov	775-687-7596
Charlie Mann ✓	Charles.m@mtgrantgenhospital.org	775-945-2461
Hugh Qualls ✓	hqualls@mtgrantgenhospital.org	775 945-2461
Louis Mendola ✓	Lmendola@remsa-cf.com	775-625-0084
Kevin Romero ✓	KRomero@remsa-cf.com	775 691 4696
Blayne Osborn ✓	blayne@nrhp.org	775 827 4770
Paul Barnes ✓	pbarnes@crowleyandferraro.com	775-731-3202
Edward McDonald ✓	emcdonald@cityofsparks.us	775-353-4089
DAVID FOGERS ✓	DFOGERS@EASTFAIRFAX.ORG	775-782-9040
JOAN HALL ✓	joan@nrhp.org	775-827-4770
Sheri Eggleston ✓	seggleston@dhep.nv.gov	775-684-7577
Erin Lynch ✓	erin.lynch@dhep.nv.gov	775 684-3654

Public Workshop on Emergency Medical Services

Division of Public and Behavioral Health, 4150 Technology Way, Room 301, Carson City, NV, 89706

Radiation Control Program, 2080 E. Flamingo Rd, Ste 319, Las Vegas, NV, 89119

Division of Public and Behavioral Health, 1020 Ruby Vista, Ste 103, Elko, NV 89801

August 7, 2018 at 11:30 a.m.

SIGN-IN SHEET

Name (print)	Email Address	Phone Number
Melanie Spencer✓	m Spencer@health.nv.gov	
Loren Beckley✓	lbeckley@health.nv.gov	
Myron Gomez✓	mgomez@Renown.ORG	
Tina Smith✓	tsmith@health.nv.gov	
Rodney Gamble		
Dennis Nolan		
Marc Pinkas		
Holly Hansen		
Temple Fletcher		
Dr. John Fildes		

(Teleconference Only)



**August 7, 2018 at 11:30 a.m.**

## SIGN-IN SHEET

## Elko Location

[illegible]