

## Red Tape Review Rule Report (Due: September 1, 2023)

<b>Department Name:</b>	Health & Human Services (HHS)	<b>Date:</b>	8/29/2023	<b>Total Rule Count:</b>	3
<b>IAC #:</b>	641	<b>Chapter/ SubChapter/ Rule(s):</b>	196	<b>Iowa Code Section Authorizing Rule:</b>	272C
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**PLEASE NOTE, THE BOXES BELOW WILL EXPAND AS YOU TYPE**

**What is the intended benefit of the rule?**

This rule chapter sets forth HHS procedure to apply credit for verified military education, training, or service toward any experience or educational requirement for EMS licensure (272C.12A) and to provide a privilege to practice under the direction of the EMS Personnel Licensure Compact (147D.1).

This chapter applies only to the Department’s emergency medical services licensure program; this is the only licensing program covered by the requirements of Iowa Code 272C to remain under the auspices of HHS upon implementation of the government reorganization. Procedures detailed additionally support the EMS Personnel Licensure Interstate Compact described in Iowa Code 147D.

**Is the benefit being achieved? Please provide evidence.**

Figures below are actuals incurred in the fiscal years shown.

**Identified Impacts\***

	SFY2018	SFY2019	SFY2020	SFY2021	SFY2022	5 Year Total
<b>Costs</b>						
HHS Implementation	N/A	N/A	N/A	N/A	N/A	N/A
<b>Benefits</b>						
Veterans and Public Safety Support	Intangible	Intangible	Intangible	Intangible	Intangible	Intangible
<b>Net Value</b>						

\*All monetary figures have been rounded to the nearest thousandth.

Credit received for military experience and use of privilege to practice through the EMS Compact for qualified current and former military members and their spouses increases public access to emergency medical services personnel, thus enhancing the state’s ability to protect public health and safety.

**What are the costs incurred by the public to comply with the rule?**

While there are costs related to being licensed by the Department, no costs are directly associated with the application of military education, training, and service as credit toward experience or privilege to practice.

**What are the costs to the agency or any other agency to implement/enforce the rule?**

This rule was implemented in May of 2023. Costs to the agency are not calculated at this time and remain to be seen. Minimal staff time is needed to process these requests.

**Do the costs justify the benefits achieved? Please explain.**

The cost benefit analysis above shows a net value of intangible, resulting in an increase in veteran and public safety support. Eliminating military service credit for current and former members of the military or eliminating privilege to practice across Compact states for military members and their spouses, may result in fewer persons applying for licensure in Iowa. This could result in a decrease in emergency medical services personnel available to protect public health and safety.

**Are there less restrictive alternatives to accomplish the benefit?  YES  NO**

**If YES, please list alternative(s) and provide analysis of less restrictive alternatives from other states, if applicable. If NO, please explain.**

HHS implements this process in accordance to the procedure set forth in Iowa Code. This rule chapter describes HHS timelines and communication methods for completing the procedure but does not ascribe additional department duties or implementation elements in addition to those directly defined in Code.

**Does this chapter/rule(s) contain language that is obsolete, outdated, inconsistent, redundant, or unnecessary language, including instances where rule language is duplicative of statutory language? [list chapter/rule number(s) that fall under any of the above categories]**

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196.2  
196.3

**RULES PROPOSED FOR REPEAL (list rule number[s]):**

None identified.

**\*RULES PROPOSED FOR RE-PROMULGATION\* (list rule number[s] or include text if available):**

196.1  
196.2  
196.3

***\*For rules being re-promulgated with changes, please attach a document with suggested changes, if available.***

**METRICS**

<b>Total number of rules repealed:</b>	0
<b>Proposed word count reduction after repeal and/or re-promulgation</b>	1,041
<b>Proposed number of restrictive terms eliminated after repeal and/or re-promulgation</b>	38

**ARE THERE ANY RULES YOU WOULD RECOMMEND BE CODIFIED IN STATUTE?**

None identified.