

BEFORE THE BOARD OF MEDICAL EXAMINERS  
DEPARTMENT OF LABOR AND INDUSTRY  
STATE OF MONTANA

In the matter of the amendment of ARM ) NOTICE OF AMENDMENT  
24.156.2720 pertaining to ECP training )  
courses )

TO: All Concerned Persons

1. On April 17, 2020, the Board of Medical Examiners (board) published MAR Notice No. 24-156-88 regarding the public hearing on the proposed amendment of the above-stated rule, at page 644 of the 2020 Montana Administrative Register, Issue No. 7.

2. On May 13, 2020, a public hearing was held on the proposed amendment of the above-stated rule in Helena. Several comments were received by the May 15, 2020, deadline.

3. The board has thoroughly considered the comments received. A summary of the comments and the board responses are as follows:

COMMENT 1: Four commenters supported the proposed rule change, stating that it would reduce the travel required of students in rural areas.

RESPONSE 1: The board appreciates all comments received during the rulemaking process.

COMMENT 2: One commenter generally supported the proposed changes but asked the board to clarify the standards the board used in determining simulation delivery and that 50% substitution is the best and right structure for EMS.

RESPONSE 2: In the board's judgment, some face-to-face training incorporating human interaction with live patients is still a required and necessary part of AEMT and paramedic clinical training. The board also recognizes the need for flexibility in areas where access to live patients may be limited. The board concluded that allowing up to 50% substitution of simulators for live patients allows flexibility while still requiring as much live patient interaction as possible. The board determined that 100% substitution of simulators for live patients is inappropriate and would like to stress that the rule allows "up to 50%" and the substitution must be requested in writing.

COMMENT 3: One commenter asked the board to define the type of human patient simulator that could be utilized.

RESPONSE 3: The board recognizes several types of simulators exist. Because the board's intent is to create flexibility for all courses, the board intentionally did not

specify a type, brand, or level of simulated patient because doing so could exclude some courses from having access to those types of simulators. Furthermore, the course medical director has discretion to dictate the type of simulator appropriate for the skill the candidate is learning.

4. The board has amended ARM 24.156.2720 with the following changes. Due to a numbering discrepancy between MAR Notice No. 24-156-86 and MAR Notice No. 24-156-88, both published in 2020 MAR Issue No. 7, it is necessary to make the following clerical correction:

24.156.2720 ECP TRAINING COURSES (1) through (8) remain as adopted. ~~(10)~~ (9) Requests for extension of required course completion times stated in ~~(9)(e)~~ (8)(c) must be submitted in writing and may be granted by the board or its designee.

BOARD OF MEDICAL EXAMINERS  
ANA DIAZ, Ph.D.  
PRESIDENT

/s/ DARCEE L. MOE  
Darcee L. Moe  
Rule Reviewer

/s/ BRENDA NORDLUND  
Brenda Nordlund, Acting Commissioner  
DEPARTMENT OF LABOR AND INDUSTRY

Certified to the Secretary of State May 19, 2020.